

# Exhibit D



## EXHIBIT A

Event/Description	Date
Rule 26(a)(1) Initial Disclosures due (LR 26.1)	August 26, 2015
Begin discovery (LR 26.2(A))	August 26, 2015
Parties to file Joint Preliminary Report and Discovery Plan	August 26, 2015
Parties to file Stipulated Protective Order of Confidentiality (see LPR 2.2)	September 9, 2015
Plaintiff must serve Disclosure of Invalidity Contentions for patent claims it asserted in the complaint (including copies of all prior art identified but not in file histories) (LPR 4.3 & 4.4a)	October 26, 2015
Defendant must serve Disclosure of Infringement Contentions (LPR 4.1 & 4.4b)	November 25, 2016
Plaintiff must serve Response to Infringement Contentions (LPR 4.2 & 4.4c)	December 15, 2015
Plaintiff must serve Disclosure of Invalidity Contentions for patent claims asserted by Defendants in the Disclosure of Infringement Contentions not addressed by Plaintiffs' first Disclosure of Invalidity Contentions	December 23, 2015
Each party to simultaneously exchange a list of claim terms, phrases or clauses that should be construed by Court, and identify any MPF claim elements ("Proposed Terms, for Construction") (LPR 6.1)	December 23, 2015

<b>Event/Description</b>	<b>Date</b>
Parties to meet and confer on Proposed Terms for Construction (LPR 6.1b)	After December 23, 2015
Parties shall simultaneously exchange a preliminary proposed construction for each claim term, phrase, or clause and exchange preliminary identification of extrinsic evidence supporting construction (dictionary definitions, treatise cites, prior art, proposed testimony) (LPR 6.2)	January 12, 2016
Parties to meet and confer to narrow claim construction issues and finalize Joint Claim Construction Statement (LPR 6.2c)	After January 12, 2016
Parties shall file a Joint Claim Construction Statement (LPR 6.3)	February 2, 2016
Complete claim construction discovery (LPR 6.4)	February 17, 2016
Opening claim construction brief (LPR 6.5)	March 3, 2016
Responsive claim construction brief (LPR 6.5)	March 23, 2016
Plaintiff must serve advice of counsel and related information rebutting a willfulness charge (LPR 5.2)	May 27, 2016
Fact Discovery Closes	June 27, 2016
Initial Rule 26 Expert Witness disclosures due on issues that a party bears the burden of proof (for non-claim construction issues) (LPR 7.1)	July 27, 2016
Second Rule 26 Expert Witness disclosures due on issues that opposing party bears the burden of proof (for non-claim construction issues) (LPR 7.1)	August 26, 2016
Rebuttal expert disclosures (when permitted by Rule 26) (LPR 7.1)	September 6, 2016
Expert depositions (LPR 7.2)	September 13- October 13, 2016
Summary Judgment Motions due (LR 56.1D)	November 14, 2016
Briefs Opposing Summary Judgment due (LR 7.1B)	December 7, 2016
Reply Briefs for Summary Judgment (LR 7.1C)	December 21, 2016