

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HOSPIRA, INC.)	
)	
Plaintiff,)	
)	C.A. No. 16-cv-651
v.)	C.A. No. 17-cv-7903
)	
FRESENIUS KABI USA, LLC)	Hon. Judge Rebecca R. Pallmeyer
)	
Defendant.)	

[PROPOSED] SCHEDULING ORDER

Pursuant to the Court's Order (Case No. 16-651, D.I. 77), Plaintiff Hospira, Inc. and Defendant Fresenius Kabi USA, LLC (collectively, "the Parties"), jointly submit the below proposed case schedule for the above-captioned cases.

Event	Date
Fresenius Kabi's Stipulation of Infringement (of an agreed set of claims) / Hospira's identification of asserted claims	Dec. 29, 2017
Written discovery requests ¹	Dec. 29, 2017
Fresenius Kabi's Invalidity Contentions	Jan. 5, 2018
Hospira's Infringement Contentions (if infringement stipulation not reached)	Jan. 5, 2018
Fresenius Kabi's Non-Infringement Contentions (if infringement stipulation not reached)	Jan. 24, 2018
Hospira's Response to Invalidity Contentions	Jan. 24, 2018
Close of Fact Discovery	Feb. 2, 2018

¹ Given the substantial discovery already completed in this case, Hospira believes the written requests should be limited to two interrogatories and five requests for admission, per side. Fresenius Kabi does not agree to a specific limitation of discovery requests but expects that the parties can reach agreement on a reasonable limitation. Hospira reserves the right to seek relief if Fresenius Kabi's requests are excessive.

Opening expert reports [Pl. Infringement (if no stipulation), Secondary Considerations; Def. Invalidity]	Feb. 9, 2018
Responsive expert reports [Pl. Validity; Def. Non-infringement (if no stipulation), Secondary Considerations]	Mar. 2, 2018
Close expert discovery	Mar. 16, 2018
Hospira's draft Pre-trial Order	Mar. 23, 2018
Final Pre-trial Order	Apr. 6, 2018
Pre-trial Conference	TBD
Trial	Late April 2018

Dated: December 21, 2017

Respectfully submitted,

/s/ Bradford P. Lyerla

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CERTIFICATE OF SERVICE

I, Yusuf Esat, an attorney at the law firm of Jenner & Block LLP, hereby certify that on December 21, 2017, I caused a true and correct copy of the foregoing **[PROPOSED]** **SCHEDULING ORDER** to be electronically served on counsel of record via the Court's CM/ECF system.

/s/ Yusuf Esat
Yusuf Esat