

EXHIBIT 1***Philips v. Fitbit*****Proposed Alternative Schedule**

Fitbit emphasizes that it does not believe further dates should be entered in the schedule, and that the Court should extend the stay for at least 60 more days due to the COVID-19 virus pandemic.

Philips reiterates that there is no need to further extend a stay.

Description	Plaintiff's Proposed Dates	Defendant's Proposed Dates in the alternative to extending the current discovery stay
Exchange of Claim terms per L.R. 16.6(e)(1)(A)	Apr. 9, 2020	Sept. 17, 2020
Deadline to Meet and Confer per 16.6(e)(1)(B)	Apr. 16, 2020	Sept. 24, 2020
Filing of Joint Claim Construction Statement per L.R. 16.6(e)(1)(D)	Apr. 23, 2020	Oct. 1, 2020
Opening Claim Construction Briefs per L.R. 16.6(e)(2)	May 7, 2020	Oct. 22, 2020
Deadline for Deposition of Claim Construction Experts per L.R. 16.6(e)(3)	May 28, 2020	Nov. 12, 2020
Deadline for Responsive Claim Construction Briefs per L.R. 16.6(e)(4)	June 18, 2020	Dec. 3, 2020
Claim Construction Hearing	July 8, 2020 (or at Court's convenience)	Feb. 2, 2021
Deadline to Serve Written Fact Discovery.	Aug. 12, 2020	Mar. 19, 2021
Fact Discovery Cutoff	Sept. 23, 2020	Apr. 23, 2021
Opening Expert Reports	Oct. 28, 2020	May 7, 2021

Description	Plaintiff's Proposed Dates	Defendant's Proposed Dates in the alternative to extending the current discovery stay
Responsive Expert Reports	Dec. 16, 2021	June 18, 2021
Expert Depositions Completed	Jan. 28, 2021	July 9, 2021
Dispositive Motions	Feb. 26, 2021	Aug. 6, 2021
Pre-Trial Conference	June 4, 2021 (or at Court's convenience)	Nov. 12, 2021