

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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| <p>SISVEL INTERNATIONAL S.A.,<br/>3G LICENSING S.A., and SISVEL S.p.A.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>CRADLEPOINT, INC.,</p> <p>Defendant.</p>  | <p>Civil Action No. 1:20-cv-00649-MN</p> |
| <p>SISVEL INTERNATIONAL S.A.,<br/>3G LICENSING S.A., and SISVEL S.p.A.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>DELL, INC.,</p> <p>Defendant.</p>   | <p>Civil Action No. 1:20-cv-00651-MN</p> |
| <p>SISVEL INTERNATIONAL S.A.,<br/>3G LICENSING S.A., and SISVEL S.p.A.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>HONEYWELL INTERNATIONAL, INC.,</p> <p>Defendant.</p>  | <p>Civil Action No. 1:20-cv-00652-MN</p> |
| <p>SISVEL INTERNATIONAL S.A.,<br/>3G LICENSING S.A., and SISVEL S.p.A.,</p> <p>Plaintiff,</p> <p>v.</p> <p>TCL COMMUNICATION TECHNOLOGY<br/>HOLDINGS LIMITED, TCT MOBILE<br/>INTERNATIONAL LIMITED, TCT<br/>MOBILE, INC., TCT MOBILE (US) INC.,<br/>and TCT MOBILE (US) HOLDINGS INC.</p> | <p>Civil Action No. 1:20-CV-00654-MN</p> |

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| Defendants.  |                                   |
| SISVEL INTERNATIONAL S.A.,<br>3G LICENSING S.A., and SISVEL S.p.A.,<br><br>Plaintiffs,<br><br>v.<br><br>VERIFONE, INC.,<br><br>Defendant.              | Civil Action No. 1:20-cv-00656-MN |
| SISVEL INTERNATIONAL S.A.,<br>3G LICENSING S.A., and SISVEL S.p.A.,<br><br>Plaintiffs,<br><br>v.<br><br>WIKO SAS and WIKO USA, INC.<br><br>Defendants. | Civil Action No. 1:20-cv-00658-MN |

**SCHEDULING ORDER**

This 8th day of December, 2020, ~~the Court having conducted an~~ <sup>MN</sup> ~~initial Rule 16(b) scheduling conference pursuant to Local Rule 16.1(b), and~~ the parties having determined after discussion that the matter cannot be resolved at this juncture by settlement, voluntary mediation, or binding arbitration;

IT IS HEREBY ORDERED that:

1. Rule 26(a)(1) Initial Disclosures and E-Discovery Default Standard. Unless otherwise agreed to by the parties, the parties shall make their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) within thirty (30) days of the date the Court enters this Order. Additionally, the parties are currently conferring regarding an ESI Order and will submit

either an agreed order or a report as to any differences on or before the date on which the parties submit a proposed Protective Order.

2. Joinder of Other Parties and Amendment of Pleadings. Unless otherwise permitted by the Federal Rules of Civil Procedure or permitted by the Court, all motions to join other parties, and to amend or supplement the pleadings, shall be filed on or before **August 5, 2021 for all issues except inequitable conduct; February 4, 2022 for inequitable conduct.** Unless otherwise ordered by the Court, any motion to join a party or motion to amend the pleadings shall be made pursuant to the procedures set forth in Paragraphs 8(g) and 9.

3. Application to Court for Protective Order. Should counsel find it will be necessary to apply to the Court for a protective order specifying terms and conditions for the disclosure of confidential information, counsel should confer and attempt to reach an agreement on a proposed form of order and submit it to the Court within thirty (30) days from the date the Court enters this Order. Should counsel be unable to reach an agreement on a proposed form of order, counsel must follow the provisions of Paragraph 8(g) below.

Any proposed protective order must include the following paragraph:

Other Proceedings. By entering this order and limiting the disclosure of information in this case, the Court does not intend to preclude another court from finding that information may be relevant and subject to disclosure in another case. Any person or party subject to this order who becomes subject to a motion to disclose another party's information designated "confidential" [the parties should list any other level of designation, such as "highly confidential," which may be provided for in the protective order] pursuant to this order shall promptly notify that party of the motion so that the party may have an opportunity to appear and be heard on whether that information should be disclosed.

4. Papers Filed Under Seal. In accordance with section G of the Revised Administrative Procedures Governing Filing and Service by Electronic Means, a redacted version of any sealed document shall be filed electronically within seven (7) days of the filing of the sealed

document.

5. Courtesy Copies. The parties shall provide to the Court two (2) courtesy copies of all briefs and any other document filed in support of any briefs (*i.e.*, appendices, exhibits, declarations, affidavits etc.). This provision also applies to papers filed under seal. All courtesy copies shall be double-sided.

6. ADR Process. This matter is referred to a magistrate judge to explore the possibility of alternative dispute resolution.

7. Disclosures. Absent agreement among the parties, and approval of the Court:

(a) By **February 26, 2021**, Plaintiffs shall identify the accused product(s), including accused methods and systems, and its damages model, as well as the asserted patent(s) that the accused product(s) allegedly infringe(s). Plaintiffs shall also produce the file history for each asserted patent.

(b) By **April 15, 2021**, Defendants shall, to the extent that they have them in their possession, produce core technical documents related to the accused product(s), sufficient to show how the accused product(s) work(s), including but not limited to non-publicly available operation manuals, product literature, schematics, and specifications. Defendants shall also produce sales figures for the accused product(s).

(c) By **May 13, 2021**, Plaintiffs shall produce an initial claim chart relating each known accused product to the asserted claims each such product allegedly infringes.

(d) By **July 1, 2021**, Defendants shall produce their initial invalidity contentions for each asserted claim, as well as the known related invalidating references.

**Preliminary Elections of Asserted Claims and Prior Art:**

(e) By **30 days prior to Identification of Claim Terms/Constructions**,

Plaintiffs shall serve a Preliminary Election of asserted claims, which shall assert: no more than ten claims from each patent and not more than a total of 32 claims.

(f) By **28 days after the Preliminary Election of Asserted Claims:**

Defendants shall serve a Preliminary Election of prior art, which shall assert no more than twelve prior art references against each patent and no more than a total of 75 references. For purposes of the Preliminary Election of Prior Art, a prior art instrumentality (such as a device or process) and associated references that describe that instrumentality shall count as one reference, as shall the closely related work of a single prior artist. For example, all 3GPP specifications in the same release count as a single reference.

(g) By **March 17, 2022**, Plaintiffs shall provide final infringement contentions.

(h) By **April 14, 2022**, Defendants shall provide final invalidity contentions.

(i) By **May 12, 2022**, Plaintiffs shall serve a Final Election of asserted claims, which shall assert: no more than five claims from each patent and not more than a total of 16 claims.

(j) By **June 21, 2022**, Defendants shall serve a Final Election of prior art, which shall assert no more than six prior art references against each patent and no more than a total of 45 references. For purposes of the Final Election of prior art, each obviousness combination counts as a separate prior art reference.

8. Discovery. Unless otherwise ordered by the Court or agreed to by parties, the limitations on discovery set forth in the Federal Rules shall be strictly observed. The parties recognize, however, that there are many patents in dispute and that there may be appropriate circumstances in which limits greater than those set forth here should be followed. If any party believes that such a situation has arisen, the parties shall confer in good faith regarding any requests

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