

EXHIBIT C

PROPOSED JOINT FINAL PRETRIAL ORDER
(Trial Management Procedures)¹

This Exhibit details the Parties agreements and understandings regarding disclosing and exchanging information and resolving objections before and during trial. The Exchanges and deadlines are summarized in the following table.

ACTIVITY	DEADLINE
Provide Court with list of unobjected to, preadmitted exhibits	7:00 pm Central one Calendar days before opening statements
Notify opposing party that a witness will be called	7:00 pm Central two Calendar days before witness will be called
Provide deposition designation clips to be played	7:00 pm Central two Calendar days before witness will be called
Provide copies of demonstrative exhibits	7:00 pm Central one Calendar day before the demonstrative will be used
Provide copies of non-documentary or physical exhibits	7:00 pm Central two Calendar days before the exhibit will be used
Objections and counter-designations to deposition testimony	7:00 pm Central one Calendar day before witness will be called
Objections to counter-designations of deposition testimony to be played	9:00 pm Central one Calendar day before witness will be called
Objections to non-documentary or physical exhibits	7:00 pm Central one Calendar day before the exhibits will be used
Objections to demonstratives	9:00 pm Central one Calendar day before the demonstrative will be used
Meet and confer to resolve any outstanding objections to demonstratives	9:30 pm Central one Calendar day before witness will be called, exhibit will be used, or demonstrative will be used.
Notify the court of unresolved dispute	10:30 pm Central one Calendar days before witness will be called, exhibit will be used, or demonstrative will be used.

¹ The parties have indicated in brackets whether a particular section is agreed or disputed. GTP's disputed proposals are set apart with brackets and highlighted in yellow. Samsung's disputed proposals are set apart with brackets and highlighted in blue.

Joint PTO Section E.

c. [AGREED] Stipulation for Trial Management Procedures

The Parties agree to the following procedure that will govern the disclosure of witnesses, exhibits, deposition testimony, and demonstratives to use at trial and the process to identify any objections remaining between the Parties with regard to these disclosures.

i. [AGREED] Notification of live witnesses

The Party calling a witness shall notify the opposing Party of the identities and the order in which they plan to witness by 7:00 pm Central time, two calendar days before the date on which the Party intends to call such witness (*e.g.*, by 7:00 p.m. on Saturday for any witness who will be called on Monday).

If a party provides a binder of exhibits to a live witness prior to the examination, the party will provide one copy of the other party.

If counsel intends to change the order of witnesses or no longer expects to call a witness, they shall notify the other side as soon as possible. The parties also recognize that the COVID-19 pandemic may affect the manner of presentation of witness testimony.

ii. [AGREED] Exchange of deposition designations

The Parties shall exchange proposed deposition designation clips by 7:00 p.m. Central two calendar days before the clips are to be played in trial, a workable copy of the actual recording to be played, including all designations and counter-designations, a timed report of the deposition designations, and shall identify any trial exhibits to be offered through that witness' deposition testimony.

The opposing party shall provide counter-designations and objections to the designated testimony by 7:00 p.m. Central one calendar day before the clips will be played. Objections to

counter designations will be exchanged by 9:00 p.m. Central the day before the testimony is to be played.

The Parties will meet and confer to resolve any objections by 9:30 p.m. the day before the testimony is to be played. Either Party can eliminate any of its proposed designations before a clip is played.

The designations and counter-designations must be presented in the order they appear in the transcript. All irrelevant and redundant material such as objections and colloquy between counsel will be eliminated when the deposition is played or read at trial. New material, not included in the parties' pretrial designations, may not be added to a witnesses deposition testimony without good cause or the other party's agreement. However, any deposition testimony may be used at trial for purposes of impeachment regardless of whether a Party identified that testimony on its list of deposition designations, if the testimony is otherwise competent for such purposes.

iii. [AGREED] Deposition counter-designations

Regardless of whether the testimony is read or played by video, the time available for each party's trial presentation shall be reduced by the length of its designations and counter-designations.

iv. [AGREED] Unobjected-to trial exhibits deemed admitted

All unobjected-to trial exhibits listed on the final exhibit lists the Parties exchange before trial are deemed admitted when introduced into evidence by any Party during trial. The parties agree to exchange lists of "Admitted Exhibits" by 7:00 p.m. Central Time the night before opening statements.

Each Party may use an exhibit that is listed on the other Party's exhibit list, to the same effect as though it were listed on its own exhibit list, subject to evidentiary objections. Any exhibit,

once admitted, may be used equally by each Party. The listing of an exhibit by a Party on its exhibit list does not waive any evidentiary or other objections to that exhibit by the listing Party should the opposing Party attempt to offer it into evidence.

v. Deadline to resolve exhibit objections

The Parties agree to meet and confer prior to the pretrial conference in an effort to resolve all outstanding exhibit objections to the parties' exhibit lists.

[Samsung's Proposal]: A party shall identify trial exhibits to be used in connection with direct examination by 7:00 p.m. Central Time the calendar day before their intended use (*e.g.*, exhibits for Monday morning will be disclosed by noon on Sunday). Any objections will be provided no later than 9:00 p.m. Central Time that same day, and the parties shall meet and confer promptly thereafter on any such objections.]^{2 3}

[Samsung's Proposal]: The parties' exhibit lists include exhibits that may not necessarily be introduced into evidence. Each party reserves the right to add additional exhibits to its exhibit list, for good cause shown, by agreement of the parties or as ordered by the Court. A party's failure to introduce any exhibit appearing on its list shall not be commented on during trial. No party will remove a document or video from its exhibit list without agreement from the other party, unless it provides the other party the opportunity to add the document or video to its exhibit list.]^{4 5}

² **[Samsung]:** Samsung believes this is necessary to help ensure an orderly presentation of evidence by the Parties and help avoid inappropriate surprise.

³ **[GTP]:** GTP objects to this proposal and does not agree to identify trial exhibits to be used in connection with direct examination by 7:00 p.m. Central Time the calendar day before their intended use.

⁴ **[Samsung]:** Samsung believes this language is necessary for purposes of clarity and consistency with the Court's local rules and Federal Rules of Evidence.

⁵ **[GTP]:** GTP objects to this proposal. GTP believes the above is governed by the Court's local rules and Federal Rules of Evidence.

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