

EXHIBIT 2

1 Alfred R. Fabricant (*pro hac vice*)
ffabricant@fabricantllp.com
2 Peter Lambrianakos (*pro hac vice*)
plambrianakos@fabricantllp.com
3 Vincent J. Rubino, III (*pro hac vice*)
vrubino@fabricantllp.com
4 Enrique Iturralde (*pro hac vice*)
eiturralde@fabricantllp.com
FABRICANT LLP
5 411 Theodore Fremd Road, Suite 206 South
Rye, New York 10580
6 Telephone: (212) 257-5797
Facsimile: (212) 257-5796

8 Benjamin T. Wang (CA SBN 228712)
bwang@raklaw.com
9 Minna Y. Chan (CA SBN 305941)
mchan@raklaw.com
RUSS AUGUST & KABAT
10 12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
11 Telephone: (310) 826-7474
Facsimile: (310) 826-9226

13 *Attorneys for Plaintiff AGIS Software
Development LLC*

DARIN W. SNYDER (S.B. #136003)
dsnyder@omm.com
LUANN L. SIMMONS (S.B. #203526)
lsimmons@omm.com
DAVID S. ALMELING (S.B. #235449)
dalmeling@omm.com
MARK LIANG (S.B. #278487)
mliang@omm.com
BILL TRAC (S.B. #281437)
btrac@omm.com
AMY K. LIANG (S.B. #291910)
aliang@omm.com
SORIN G. ZAHARIA (S.B. #312655)
szaharia@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Fl.
San Francisco, CA 94111
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

STACY YAE (S.B. #315663)
syac@omm.com
O'MELVENY & MYERS LLP
400 South Hope St., 18th Fl.
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

*Attorneys for Defendants Google LLC and
Waze Mobile Ltd.*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN JOSE DIVISION**

20 AGIS SOFTWARE DEVELOPMENT LLC,
21 Plaintiff,

22 v.

23 GOOGLE LLC,
24 Defendant.

25 AGIS SOFTWARE DEVELOPMENT LLC,
26 Plaintiff,

27 v.

27 WAZE MOBILE LTD.,
28 Defendant.

Case No. 5:22-cv-04826-BLF
(Consolidated case)

**JOINT STIPULATION AND
[PROPOSED] CASE SCHEDULE**

Judge: Hon. Beth Labson Freeman
Courtroom: 3, Fifth Floor

Complaint Filed: November 4, 2019

1 Plaintiff AGIS Software Development (“AGIS”) and Defendants Google LLC (“Google”)
2 and Waze Mobile Ltd. (“Waze”) (collectively, “the parties”) submit this Joint Stipulation and
3 Proposed Case Schedule pursuant to the Court’s Case Management Order (ECF No. 424).

4 IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the
5 Court’s approval, that the following case schedule applies:¹

Scheduled Event	Deadline
Plaintiff’s Patent L. R. 3-1, 3-2 Disclosures ²	March 15, 2023
Defendants’ Consolidated Summary Judgment Motion ³	April 3, 2023

11 _____
12 ¹ The parties have not proposed deadlines for claim construction disclosures under Patent L. R. 4,
13 as the Court stated it plans to follow the claim constructions ordered in E.D. Tex. ECF No. 420,
14 429.

15 ² AGIS has agreed to dismiss with prejudice its allegations for the original claims of U.S. Patent
16 No. 8,213,970 (“’970 Patent”) from this case. Accordingly, the parties will not address the ’970
17 Patent in their Patent L.R. disclosures. For example, Google will not address the ’970 Patent in its
18 Patent L.R. 3-3 invalidity contentions. Further, because the parties completed fact discovery,
19 including document productions, while this case was pending in E.D. Tex., the parties’ respective
20 Patent L.R. 3-2 and 3-4 production deadlines apply only to any required supplementation to their
21 existing productions.

22 ³ In accordance with the Court’s statements during the March 1, 2023 initial case management
23 conference, the parties will meet and confer after the filing of Defendants’ Consolidated Summary
24 Judgment Motion to determine the deadlines for (1) the opposition and reply briefing to the
25 Summary Judgment Motion and (2) any needed supplementation of expert reports proposed by
26 AGIS responsive to the Summary Judgment Motion. [Defendants do not believe that any
27 supplementation of expert reports is required in response to Defendants’ Consolidated Summary
28 Judgment Motion because the parties completed expert discovery, but Defendants are willing to

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Scheduled Event	Deadline
Deadline to Amend Pleadings or Join Parties	May 1, 2023
Defendants’ Patent L.R. 3-3, 3-4 Disclosures	May 1, 2023
Joint Case Management Statement For Second Case Management Conference	June 1, 2023
Second Case Management Conference	June 8, 2023
Plaintiff’s Patent L.R. 3-8 Damages Contentions	June 20, 2023
Defendants’ Patent L. R. 3-9 Responsive Damages Contentions	July 20, 2023
Technology / Claims Tutorial	9:00am PT, August 11, 2023 (in person)
ADR Deadline (ECF No. 427)	September 1, 2023
Hearing on Defendants’ Consolidated Summary Judgment Motion	September 7, 2023
Close of Supplemental Fact Discovery ⁴	September 11, 2024
Advice of Counsel (Patent L.R. 3-7)	September 15, 2024
Supplemental Opening Expert Reports by the parties on issues where they bear the burden of proof	October 2, 2024
Supplemental Rebuttal Expert Reports	November 20, 2024
Close of Supplemental Expert Discovery	December 18, 2024
Final Day for Filing Dispositive Motions	January 22, 2025
Oppositions to Dispositive Motions	February 26, 2025

meet and confer about any supplementation proposed by AGIS.] Consistent with the Court’s statements, the proposed schedule shall complete all briefing by no later than August 7, 2023.

⁴ The parties have proposed dates for fact and expert discovery. But because the parties completed fact and expert discovery in the Eastern District of Texas before this case was transferred to this District, any further discovery in this case will not go beyond any required supplementations of document productions, discovery responses, Patent L.R. disclosures, and expert reports. The parties will meet and confer regarding the scope of any additional supplemental fact and expert discovery.

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Scheduled Event	Deadline
Replies to Dispositive Motions	March 20, 2025
Last Day to Hear Dispositive Motions	April 3, 2025
Final Pretrial Conference	July 17, 2025
Trial	August 18, 2025

IT IS SO STIPULATED.

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