

**APPENDIX A: PROPOSED CASE SCHEDULE**

Event	Deadline
P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served	May 21, 2020
Join Additional Parties	April 27, 2020
Mediation.	30 days after entry of the claim construction order, or 90 days before the close of fact discovery, whichever occurs first
Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).	May 18, 2020
P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.	June 16, 2020
Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).	June 23, 2020
Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).	June 30, 2020
Parties' Final Amended Pleadings <b>(A motion for leave is required.)</b>	June 22, 2020
Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.	July 16, 2020
Respond to Amended Pleadings	July 13, 2020

Event	Deadline
Completion date for discovery on claim construction (P.R. 4-4).	July 23, 2020
Opening claim construction brief (P.R. 4-5(a)).	August 7, 2020
Responsive claim construction brief (P.R. 4-5(b)).	August 21, 2020
Reply claim construction brief (P.R. 4-5(c)).	August 28, 2020
Submit technology synopsis/tutorial (both hard copy and disk).	(Parties submit using -476 Action submissions)
Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.	September 11, 2020
Proposed Claim Construction hearing	<b>Monday, September 21, 2020 (subject to Court approval)</b>
Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.	October 1, 2020
Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).	October 23, 2020

Event	Deadline
Comply with P.R. 3-7. (Designation of Wilfulness Opinions).	September 21, 2020
<p>Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B).</p> <p><b>Note: Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.</b></p>	November 13, 2020
Discovery Deadline. All discovery must be served in time to be completed by this date.	December 1, 2020
<p>File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7.</p> <p><b>Responses to motions shall be due in accordance with Local Rule CV-7(e).</b></p>	December 21, 2020
Notice of intent to offer certified records	March 22, 2021
Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order ( <i>See</i> <a href="http://www.txed.uscourts.gov">www.txed.uscourts.gov</a> ) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).	March 22, 2021

Event	Deadline
<p>Video Deposition Designation due. Each party who proposes to offer a deposition by video shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and requesting cross examination line and page numbers to be included. Counsel must consult on any objections and only those which cannot be resolved shall be presented to the court. The party who filed the initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties designations and the court's rulings on objections</p>	<p>March 29, 2021</p>
<p>Motions in limine due</p> <p>File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies</p>	<p>April 1, 2021</p>
<p>Response to motions in limine due</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to docket call.</p> <p>File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p>	<p>April 15, 2021</p>
<p>Final Pretrial Conference at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.</p>	<p>April 29, 2021</p>

Event	Deadline
10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.	TBD