

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DEMARAY LLC, Plaintiff, v. INTEL CORPORATION, Defendant	CASE NO. 6:20-cv-00634-ADA JURY TRIAL DEMANDED
DEMARAY LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., et al., Defendants.	CASE NO. 6:20-cv-00636-ADA JURY TRIAL DEMANDED

JOINT MOTION TO AMEND SCHEDULE

Plaintiff Demaray LLC (“Demaray”), Defendant Intel Corporation (“Intel”), and Defendants Samsung Electronics Co., Ltd., (a Korean Company), Samsung Austin Semiconductor, LLC, Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively “Samsung”) (collectively “the Parties”), by and through their undersigned counsel, and subject to the approval of the Court, hereby jointly move the Court to amend the case deadlines in the two above-captioned matters to the below agreed-to deadlines.

On September 12, 2022, Demaray filed motions to extend the discovery deadlines in the respective cases. *See* Dkt. 230 (6:20-cv-00634); Dkt. 218 (6:20-cv-00636). Thereafter, the Parties further met and conferred regarding alternative trial dates and determined that a trial date of

September 11, 2023 did not pose conflicts and would allow for an extension of discovery and other deadlines. On September 14, 2022, during discovery hearings, the Parties informed the Court of the proposed trial date of September 11, 2023 and that they would further meet and confer to align the remaining deadlines in the cases to that trial date. *See* Dkt 235 at 4-5 (6:20-cv-00634); *see also* Dkt. 222 (6:20-cv-00636). The Court stated that a trial date of September 11, 2023 was acceptable. *Id.* The Parties having reached agreement on the remaining deadlines in the cases, Demaray withdraws its motions to extend the discovery deadlines, and the Parties respectfully request that the Court grant their joint motion to amend the schedule with the following deadlines:

Date	Deadline
11/04/2022	Deadline for the first of two meet and confers to discuss significantly narrowing the number of claims asserted and prior art references at issue. Unless the parties agree to the narrowing, they are ordered to contact the Court's Law Clerk to arrange a teleconference with the Court to resolve the disputed issues.
2/09/2023	Close of Fact Discovery
3/16/2023	Opening Expert Reports
4/27/2023	Rebuttal Expert Reports
5/31/2023	Close of Expert Discovery
6/05/2023	Deadline for the second of two meet and confer to discuss narrowing the number of claims asserted and prior art references at issue to triable limits. To the extent it helps the parties determine these limits, the parties are encouraged to contact the Court's Law Clerk for an estimate of the amount of trial time anticipated per side. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer.
6/15/2023	Dispositive motion deadline and <i>Daubert</i> motion deadline
6/29/2023	Serve Pretrial Disclosures (jury instructions, exhibits lists, witness lists, designations)
7/17/2023	Parties to jointly email the Court's law clerk to confirm their pretrial conference and trial dates.
7/20/2023	Serve objections to pretrial disclosures/rebuttal disclosures
7/27/2023	File Motions <i>in limine</i>
7/27/2023	Serve objections to rebuttal disclosures

Date	Deadline
8/03/2023	File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibits lists, witness lists, designations); file oppositions to motions <i>in limine</i>
8/07/2023	File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e-mail the Court Reporter, Kristie Davis at kmdaviscsr@yahoo.com . Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i>
8/18/2023	File joint notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i>
8/21/2023	Final Pretrial Conference
9/11/2023	Jury Selection/Trial

The Parties, by and through their undersigned counsel of record, in the interests of judicial economy, agree and stipulate, and respectfully request that the Court grant this motion and enter this revised schedule. A proposed order consistent with the above is attached as Exhibit A.

Dated: September 27, 2022

Respectfully submitted,

KIRKLAND & ELLIS, LLP

/s/ Kat Li

Kat Li

Attorneys for Defendants, Samsung Electronics
et al.

Dated: September 27, 2022

Respectfully submitted,

WILMER CUTLER PICKERING HALE &
DORR, LLP

/s/ Mary V. Sooter

Mary V. Sooter

Attorneys for Defendant Intel Corporation

Dated: September 27, 2022

Respectfully submitted,

FOLIO LAW GROUP PLLC

/s/ C. Maclain Wells

C. Maclain Wells

Attorneys for Plaintiff Demaray LLC

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on September 27, 2022 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Kat Li

Kat Li