

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

Advanced Silicon Technologies LLC,

Plaintiff,

v.

NXP Semiconductors N.V.,

NXP B.V., and

NXP USA, Inc.,

Defendants.

Case No. 6:22-cv-00466-ADA-DTG

Jury Trial Demanded

Joint Motion to Amend Scheduling Order (ECF No. 45)

Plaintiff Advanced Silicon Technologies LLC and Defendant NXP USA, Inc. have conferred and jointly move to amend the Scheduling Order (ECF No. 45) to extend the remaining deadlines in the Scheduling Order by approximately 60 days, as outlined below.

The parties request this extension to allow for the completion of domestic and foreign party and third-party discovery and corresponding amendments to the parties' infringement and invalidity contentions without the risk of requiring supplemental expert reports. The parties also request this additional time to continue discussions aimed at streamlining the issues to be decided here and reducing the overall number of remaining documents to be produced and witnesses to be produced, thereby making discovery more efficient overall.

The proposed extensions are as follows:

Event	Current Date	New Date
First case narrowing meet and confer deadline	July 31, 2023	September 29, 2023
Close of fact discovery	August 28, 2023	October 27, 2023
Opening expert reports	September 11, 2023	November 9, 2023
Rebuttal expert reports	October 9, 2023	December 8, 2023
Close of expert discovery	October 23, 2023	December 22, 2023
Second case narrowing meet and confer deadline	October 30, 2023	December 29, 2023
Dispositive and <i>Daubert</i> motion deadline	November 6, 2023	January 12, 2024
Oppositions to dispositive and <i>Daubert</i> motions	November 20, 2023	January 26, 2024
Serve pretrial disclosures	November 20, 2023	January 26, 2024
File replies in support of dispositive and <i>Daubert</i> motions	November 27, 2023	February 2, 2024
Serve objections to pretrial disclosures and rebuttal disclosures	December 4, 2023	February 9, 2024
Parties jointly email law clerks to confirm pretrial conference and trial dates	December 4, 2023	February 9, 2024
Serve objections to rebuttal disclosures; file motions <i>in limine</i>	December 11, 2023	February 16, 2024
File joint pretrial order, pretrial submissions, and oppositions to motions <i>in limine</i>	December 18, 2023	February 23, 2024
File notice of request for daily transcript or real time reporting	December 29, 2023	March 8, 2024
File joint notice identifying remaining objections to pretrial disclosures and motions <i>in limine</i>	January 5, 2023	March 15, 2024
Final pretrial conference	January 8, 2024	March 28, 2024
Jury selection/trial	January 29, 2024	April 8, 2024

For these reasons, the parties jointly request that the Court enter the above modifications to the Scheduling Order.

Dated: July 31, 2023

By: /s/ Patrick A. Fitch
Brian A. Carpenter (State Bar No. 3840600)
carpenter@caglaw.com
Carstens, Allen & Gourley, LLP
1105 Wooded Acres, Suite 415
Waco, Texas 76701
(254) 294-1854 (Telephone)

Robert R. Brunelli (admitted *pro hac vice*)
rbrunelli@sheridanross.com
Patrick A. Fitch (admitted *pro hac vice*)
pfitch@sheridanross.com
Alex W. Ruge (admitted *pro hac vice*)
aruge@sheridanross.com
Brian Boerman (admitted *pro hac vice*)
bboerman@sheridanross.com
Angela J. Bubis (admitted *pro hac vice*)
abubis@sheridanross.com
Briana D. Long (admitted *pro hac vice*)
blong@sheridanross.com
Sheridan Ross P.C.
1560 Broadway, Suite 1200
Denver, Colorado 80202
(303) 863-9700 (Telephone)
(303) 863-0223 (Facsimile)
litigation@sheridanross.com

Attorneys for Plaintiff
Advanced Silicon Technologies LLC

Respectfully submitted,

By: /s/ Richard S. Zembek
Richard S. Zembek (SBN 00797726)
richard.zembek@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
Fulbright Tower
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
Tel: (713) 651-5151
Fax: (713) 651-5246

Eric C. Green (SBN 24069824)
eric.green@nortonrosefulbright.com
Catherine Garza (SBN 24073318)
cat.garza@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Boulevard, Suite 1100
Austin, Texas 78701
Tel: (512) 474-5201
Fax: (512) 536-4598

Counsel for Defendant NXP USA, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record in the above-referenced matter.

/s/ Thomas J. Armento

Thomas J. Armento
Paralegal
tarmeto@sheridanross.com
Sheridan Ross P.C.
1560 Broadway, Suite 1200
Denver, Colorado 80202
(303) 863-9700 (Telephone)
(303) 863-0223 (Facsimile)
litigation@sheridanross.com