

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.

Civil Action No. 6:22-cv-00466-ADA-DTG

Jury Trial Demanded

Joint Motion to Amend First Amended Scheduling Order (ECF No. 79)

Plaintiff Advanced Silicon Technologies LLC and Defendant NXP USA, Inc. have conferred and jointly move to amend the First Amended Scheduling Order (ECF No. 79) to extend the remaining deadlines in the Scheduling Order as outlined below.

The parties request this extension to allow for the completion of domestic 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 Proposed Date
Close of fact discovery	October 27, 2023	January 26, 2024
Opening expert reports	November 9, 2023	February 8, 2024
Rebuttal expert reports	December 8, 2023	March 8, 2024
Close of expert discovery	December 22, 2023	March 22, 2024
Second case narrowing meet and confer deadline	December 29, 2023	March 29, 2024
Dispositive and <i>Daubert</i> motion deadline	January 12, 2024	April 12, 2024
Oppositions to dispositive and <i>Daubert</i> motions	January 26, 2024	April 26, 2024
Serve pretrial disclosures	January 26, 2024	April 26, 2024
File replies in support of dispositive and <i>Daubert</i> motions	February 2, 2024	May 3, 2024
Serve objections to pretrial disclosures and rebuttal disclosures	February 9, 2024	May 10, 2024
Parties jointly email law clerks to confirm pretrial conference and trial dates	February 9, 2024	May 10, 2024
Serve objections to rebuttal disclosures; file motions <i>in limine</i>	February 16, 2024	May 17, 2024
File joint pretrial order, pretrial submissions, and oppositions to motions <i>in limine</i>	February 23, 2024	May 24, 2024
File notice of request for daily transcript or real time reporting; Deadline to file replies to motions <i>in limine</i>	March 8, 2024	June 7, 2024
File joint notice identifying remaining objections to pretrial disclosures and motions <i>in limine</i>	March 15, 2024	June 14, 2024
Final pretrial conference	March 28, 2024	June 27, 2024
Jury selection/trial	April 8, 2024	July 8, 2024

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

Dated: October 26, 2023

Respectfully submitted,

By: /s/ Patrick A. Fitch
Brian A. Carpenter (State Bar No. 3840600)
carpenter@caglaw.com
Carstens, Allen & Gourley, LLP
7500 Dallas Parkway, Suite 300
Plano, Texas 75024
(972) 367-2001 (Telephone)

Robert R. Brunelli (admitted *pro hac vice*)
rbrunelli@sheridanross.com
Patrick A. Fitch (admitted *pro hac vice*)
pfitch@sheridanross.com
Paul S. Cha (admitted *pro hac vice*)
pscha@sheridanross.com
Brian S. Boerman (admitted *pro hac vice*)
bboerman@sheridanross.com
Bart A. Starr (admitted *pro hac vice*)
bstarr@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

By: /s/ Eric C. Green
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 October 26, 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/ Lori R. Brown

Lori R. Brown

Paralegal

Sheridan Ross P.C.

1560 Broadway, Suite 1200

Denver, Colorado 80202

(303) 863-9700 (Telephone)

(303) 863-0223 (Facsimile)

litigation@sheridanross.com