

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 Second Amended Scheduling Order (ECF No. 88)

Plaintiff Advanced Silicon Technologies LLC and Defendant NXP USA, Inc. have conferred and jointly move to amend the Second Amended Scheduling Order (ECF No. 88) to extend the remaining deadlines in the Scheduling Order by approximately 30 days, as outlined below.

The parties request this extension to allow for the completion of domestic discovery 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	January 26, 2024	February 26, 2024
Opening expert reports	February 8, 2024	March 11, 2024
Rebuttal expert reports	March 8, 2024	April 8, 2024
Close of expert discovery	March 22, 2024	April 22, 2024
Second case narrowing meet and confer deadline	March 29, 2024	April 29, 2024
Dispositive and <i>Daubert</i> motion deadline	April 12, 2024	May 13, 2024
Oppositions to dispositive and <i>Daubert</i> motions	April 26, 2024	May 28, 2024
Serve pretrial disclosures	April 26, 2024	May 28, 2024
File replies in support of dispositive and <i>Daubert</i> motions	May 3, 2024	June 3, 2024
Serve objections to pretrial disclosures and rebuttal disclosures	May 10, 2024	June 10, 2024
Parties jointly email law clerks to confirm pretrial conference and trial dates	May 10, 2024	June 10, 2024
Serve objections to rebuttal disclosures; file motions <i>in limine</i>	May 17, 2024	June 17, 2024
File joint pretrial order, pretrial submissions, and oppositions to motions <i>in limine</i>	May 24, 2024	June 24, 2024
File notice of request for daily transcript or real time reporting; Deadline to file replies to motions <i>in limine</i>	June 7, 2024	July 8, 2024
File joint notice identifying remaining objections to pretrial disclosures and motions <i>in limine</i>	June 14, 2024	July 15, 2024
Final pretrial conference	June 27, 2024	July 29, 2024
Jury selection/trial	July 8, 2024	August 12, 2024

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

Dated: December 28, 2023

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Respectfully submitted,

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Counsel for Defendant NXP USA, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 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.

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