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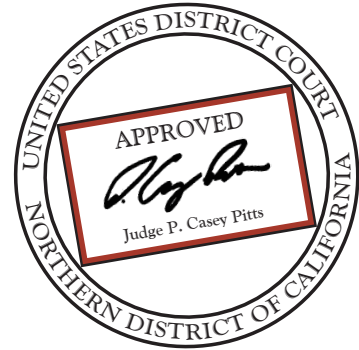
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1 *and Defendant and Counterclaim Plaintiff CamelBak*
2 *Products, LLC*



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6 Dated: June 18, 2024

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN JOSE DIVISION

10 TROVE BRANDS, LLC,

11 Plaintiff,

12 vs.

13 CAMELBAK PRODUCTS, LLC and VISTA
14 OUTDOOR INC.,

15 Defendants.

No.: 5:23-cv-4267-PCP

**STIPULATION AND JOINT MOTION TO
AMEND THE CASE SCHEDULE**

Complaint Filed: August 21, 2023

16 Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim
17 Defendant Trove Brands, LLC, (“Trove”), Defendant Vista Outdoor Inc. (“Vista”), and Defendant
18 and Counterclaim Plaintiff CamelBak Products, LLC (“CamelBak Products”) (Vista and CamelBak
19 Products collectively, “CamelBak”), through their respective counsel, hereby stipulate and jointly
20 move the Court to amend the current case schedule (D.N. 72), as reflected below.

21 WHEREAS, on February 14, 2024, the Court entered its Order regarding Motion to Amend
22 Pleadings and amended the original case schedule. *See* D.N. 36.

23 WHEREAS, on May 17, 2024, the Parties filed a Stipulation and Joint Motion to Amend the
24 Case Schedule to extend the Parties’ deadlines to serve damages contentions to provide additional
25 time for CamelBak to review additional documents produced by Trove. *See* D.N. 62.

26 WHEREAS, on May 24, 2024, the Court entered its Order regarding Stipulation and Joint
27 Motion to Amend the Case Schedule. *See* D.N. 62.

1 WHEREAS, under the operative case schedule, CamelBak’s opening damages contentions
2 are currently due June 18, 2024, and Trove’s responsive damages contentions are currently due July
3 18, 2024. *See id.*

4 WHEREAS, on June 17, 2024, Trove produced additional documents, including sales
5 information discussed in the Court’s June 6, 2024 Order (D.N. 87), that CamelBak believes are
6 relevant to its damages contentions;

7 WHEREAS, on June 17, 2024 Trove also produced additional documents relating to licenses
8 that CamelBak believes are relevant to its damages contentions, and Trove may produce more such
9 licenses on or before July 3, 2024;

10 WHEREAS, CamelBak will need additional time to review and analyze Trove’s June 17,
11 2024 and July 3, 2024 document productions to prepare its damages contentions;

12 WHEREAS, under the operative case schedule, the Parties Joint Claim Construction and
13 Prehearing Statement is due June 26, 2024. *See D.N. 62*;

14 WHEREAS, on May 24, 2024, the Court granted CamelBak’s motion for leave to amend
15 infringement contentions. *See D.N. 73*. In that Order, the Court also permitted Trove to propose a
16 modification to the case schedule to revisit or amend its invalidity contentions and claim
17 construction positions. *See id.*

18 WHEREAS, the Parties request a modification of the claim construction deadlines to
19 accommodate positions that may change as a result of the amended contentions.

20 THEREFORE, Trove and CamelBak stipulate and jointly move the Court to amend
21 the case schedule, as reflected below:

Event	Current Deadline	Revised Deadline
Damages Contentions	6/18/2024	7/18/2024
Trove Brands to Serve Amended Invalidity Contentions		7/18/2024
Joint Claim Construction and Prehearing Statement and Expert Reports	6/26/2024	7/26/2024

Event	Current Deadline	Revised Deadline
Claim Construction Discovery Cutoff	7/12/2024	8/12/2024
Responsive Damages Contentions	7/18/2024	8/19/2024
Opening Claim Construction Brief	7/26/2024	8/26/2024
Responsive Claim Construction Brief	8/9/2024	9/9/2024
Reply Claim Construction Brief	8/16/2024	9/16/2024
Damages Contention Meeting	8/28/2024	9/30/2024
Claim Construction Hearing	8/28/2024	9/25/2024 or TBD by Court
Non-Expert Discovery Cutoff	12/9/2024	12/20/2024
Expert Discovery Cutoff	3/10/2025	3/24/2025
[Tentative] Filing Date of	5/1/2025	5/1/2025
Deadline for Hearing Dispositive Motion(s)	6/5/2025	6/5/2025
Joint Pretrial Conference	9/2/2025	9/2/2025
Trial (5 days)	9/22/2025	9/22/2025

Dated: June 17, 2024

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ATTESTATION OF CONCURRENCE

I, Ryan J. Schletzbaum, attest that I am the attorney for CamelBak Products, LLC and Vista Outdoor Inc., and as the ECF user and filer of this document, I attest that, pursuant to the United States District Court, Northern District of California Civil L.R. 5-1(i)(3), concurrence in the filing of this document has been obtained from counsel for Plaintiff and Counterclaim Defendant Trove Brands, LLC.

Dated: June 17, 2024

By: /s/ Ryan J. Schletzbaum
Ryan J. Schletzbaum