

1 DARIN W. SNYDER (S.B. #136003)
dsnyder@omm.com
2 LUANN L. SIMMONS (S.B. #203526)
lsimmons@omm.com
3 DAVID S. ALMELING (S.B. #235449)
dalmeling@omm.com
4 AMY K. LIANG (S.B. #291910)
aliang@omm.com
5 O'MELVENY & MYERS LLP
Two Embarcadero Center
6 28th Floor
San Francisco, California 94111-3823
7 Telephone: +1 415 984 8700
Facsimile: +1 415 984 8701

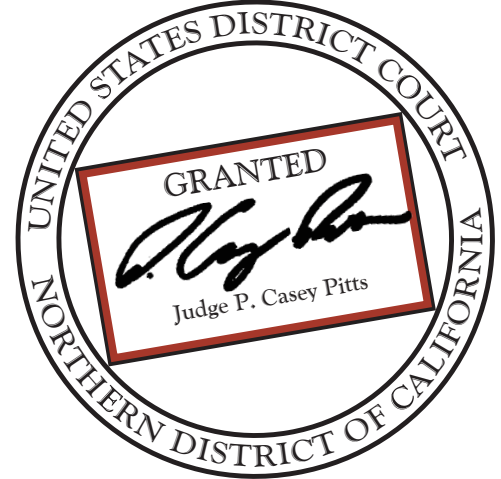
8 MARK A. HAYDEN (*pro hac vice*)
9 mhayden@omm.com
O'MELVENY & MYERS LLP
10 Times Square Tower
7 Times Square
11 New York, New York 10036-6537
Telephone: +1 212 326 2000
12 Facsimile: +1 212 326 2061

13 Attorneys for Defendant
Google LLC

14 (*additional counsel listed on signature page*)
15

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE

19
20 SAFECAST LIMITED,
21 Plaintiff,
22 v.
23 GOOGLE LLC,
24 Defendant.



Dated: November 27, 2023

Case No. 23-cv-03128-PCP
JOINT PROPOSED CASE SCHEDULE

1 Pursuant to the Court's orders at the Case Management Hearing on November 9, 2023, the
2 Parties jointly submit the following proposed case schedule:

3	Event	Deadline
4	Deadline to notify Court of selection of Mediator	December 11, 2023
5	Last Day to Amend Pleadings	December 6, 2023
6	SafeCast serves Infringement Contentions and Document Production (Patent L.R. 3-1, 3-2) ¹	January 12, 2024
7	Parties to exchange list of terms to be construed by the Court (Patent L.R. 4-1)	January 19, 2024
8	Parties to exchange preliminary claim constructions and extrinsic evidence (Patent L.R. 4-2)	February 2, 2024
9	Parties to submit Joint Claim Construction and Prehearing Statement and Expert Reports (Patent L.R. 4-3)	February 9, 2024
10	End of Claim Construction Discovery	February 16, 2024
11	Plaintiff to file Opening Claim Construction Brief	February 23, 2024
12	Google serves Invalidity Contentions and Document Production (Patent L.R. 3-3, 3-4)	February 26, 2024
13	Defendant to file Responsive Claim Construction Brief	March 8, 2024
14	Plaintiff to file Reply Claim Construction Brief	March 15, 2024
15	Claim construction hearing (Patent L.R. 4-6)	Subject to the Court's availability
16	SafeCast's Damages Contentions (Patent L.R. 3-8)	April 16, 2024
17	Fact Discovery Opens	May 1, 2024
18	Google's Responsive Damages Contentions (Patent L.R. 3-9)	May 16, 2024
19	Deadline to Complete Fact Discovery	November 15, 2024
20	Deadline to Complete Mediation	November 22, 2024
21	Opening Expert Reports due	December 18, 2024
22	Rebuttal Expert Reports due	February 7, 2025
23	Close of Expert Discovery	March 11, 2025
24	Deadline to file Dispositive and <i>Daubert</i> Motions	April 10, 2025

25
26
27 ¹ The supplemental infringement contentions are intended to put them in compliance with the Patent
28 Local Rules and may not assert claims or accuse products that were not previously asserted or accused.

Event	Deadline
Deadline to serve Pretrial Disclosures (jury instructions, exhibit lists, witness lists, and deposition designations)	June 10, 2025
Deadline to serve Objections to Pretrial Disclosure and Rebuttal Disclosures	July 11, 2025
Deadline to serve Rebuttal Disclosures and file Motions <i>in Limine</i>	August 11, 2025
Deadline to file Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, deposition designations)	September 10, 2025
Deadline to file Joint Notice regarding resolution of disputes regarding pretrial disclosures and Motions <i>in Limine</i> and identification of remaining disputes requiring resolution by the Court at the pre-trial conference	September 24, 2025
Final Pretrial Conference	October 7, 2025
Jury Selection / Trial	November 10, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Dated: November 24, 2023

O'MELVENY & MYERS LLP

By: /s/ David S. Almeling
David S. Almeling

DARIN W. SNYDER (S.B. #136003)
dsnyder@omm.com
LUANN L. SIMMONS (S.B. #203526)
lsimmons@omm.com
DAVID S. ALMELING (S.B. #235449)
dalmeling@omm.com
AMY K. LIANG (S.B. #291910)
aliang@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, California 94111-3823
Telephone: +1 415 984 8700
Facsimile: +1 415 984 8701

MARK A. HAYDEN (*pro hac vice*)
mhayden@omm.com
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, New York 10036-6537
Telephone: +1 212 326 2000
Facsimile: +1 212 326 2061

Attorneys for Defendant Google LLC

17 Dated: November 24, 2023

RAMEY LLP

By: /s/ William P. Ramey

Susan S.Q. Kalra, CA SBN 167940
skalra@rameyfirm.com
RAMEY LLP
303 Twin Dolphin Drive, Suite 600
Redwood City, California 94065
Telephone: +1 800 993 7499

William P. Ramey, III (*pro hac vice*)
wramey@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
Telephone: +1 713 426 3923
Facsimile: +1 832 900 4941

Attorneys for Plaintiff SafeCast Limited

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Pursuant to L.R. 5-1(i)(3), I, David S. Almeling, attest that counsel for SafeCast Limited, William P. Ramey, concurred in the filing of this document.

Dated: November 24, 2023

By: /s/ David S. Almeling
David S. Almeling