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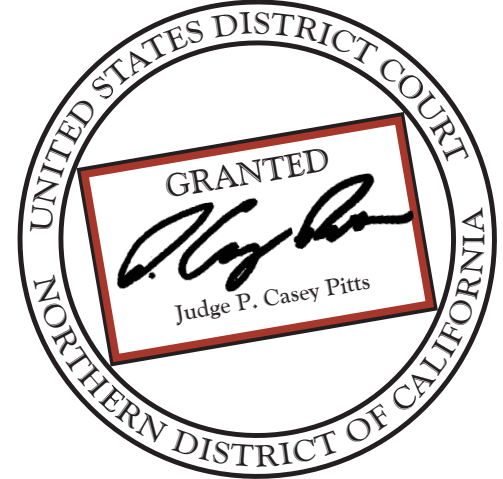
14 (*additional counsel listed on signature page*)
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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE

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

Case No. 23-cv-03128-PCP

JOINT PROPOSED CASE SCHEDULE



Dated: November 27, 2023

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

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

¹ The supplemental infringement contentions are intended to put them in compliance with the Patent 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 Dated: November 24, 2023

O'MELVENY & MYERS LLP

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

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17 Dated: November 24, 2023

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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