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PAYPAL, INC.

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

17 ECARDLESS BANCORP, LTD.,

18 Plaintiff,

19 v.

20 PAYPAL, INC.,

21 Defendant.
22

Case No. 5:24-cv-01054-BLF

STIPULATED SCHEDULE AND ~~PROPOSED~~ ORDER

Date: May 24, 2024

Judge: The Honorable
Beth Labson Freeman

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STIPULATED SCHEDULE
CASE NO. 5:24-cv-01054-BLF

Pursuant to the Court's Case Management Order (Dkt. 123), Plaintiff eCardless Bancorp, Ltd. ("eCardless") and Defendant PayPal, Inc. ("PayPal") (collectively, the "Parties") jointly propose and respectfully submit the following schedule:

Event	Stipulated Date
Deadline for eCardless to Comply with P.L.R. 3-1 (Disclosure of Asserted Claims and Infringement Contentions)	June 3, 2024
Deadline for PayPal to Answer or Respond to the Complaint	June 3, 2024 Agreed; JCMS, Dkt. 117-3
Deadline for PayPal to File any Motion to Dismiss	June 3, 2024
Deadline for eCardless to File Opposition to Motion to Dismiss	June 17, 2024
Deadline for PayPal to File Reply to Opposition to Motion to Dismiss	June 24, 2024
Last Day to Request Leave to Amend the Pleadings per F.R. Civ. P 15	July 2, 2024 Dkt. 123
PayPal's Deadline to Comply with P.L.R. 3-3 (Invalidity Contentions)	July 3, 2024

1 2 3 4	Deadline to Comply with P.L.R. 4-3 (Joint Claim Construction and Prehearing Statement)	July 3, 2024
5 6 7	Deadline for PayPal to File Opening Claim Construction Brief	July 5, 2024 Transcript at 28:7-8
8 9	Deadline to File Case Management Statement	July 11, 2024 Dkt. 123
10 11 12	Subsequent Case Management Conference	July 18, 2024, at 11:00am Dkt. 123
13 14	Deadline for eCardless to File Opposition Construction Brief	August 2, 2024 Transcript at 28:8-9
15 16 17	eCardless' Deadline to Comply with P.L.R. 3-8 (Damages Contentions)	August 20, 2024
18 19 20	Deadline for PayPal to File Reply Claim Construction Brief	August 23, 2024 Transcript at 28:9
21 22 23	Deadline for PayPal to Comply with P.L.R. 3-9 (Responsive Damages Contentions)	September 20, 2024
24 25 26	Claims Tutorial	October 4, 2024, at 9:00am Dkt. 123

1		October 11, 2024, at 9:00am
2	<i>Markman</i> Hearing	Dkt. 123
3		
4	Deadline to Comply with P.L.R. 3-10	November 19, 2024
5	(Damages Contentions Meeting and Certification)	
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7		
8	Close of Fact Discovery	January 17, 2025
9		
10	Deadline to Complete Settlement Conference with Magistrate Judge	February 28, 2025
11		Dkt. 123
12	Opening Expert Reports	March 30, 2025
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14	Rebuttal Expert Reports	April 30, 2025
15		
16	Close of Expert Discovery	May 30, 2025
17		
18	Last Day to File Dispositive Motions	June 27, 2025
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20	Deadline to File Oppositions to Dispositive Motions	July 25, 2025
21		
22	Deadline to File Reply to Dispositive Motions	August 15, 2025
23		
24	Last Day to Hear Dispositive Motions	September 18, 2025, at 9:00am
25		Dkt. 123
26		
27	Pretrial Conference	December 18, 2025, at 1:30pm
28		Dkt. 123

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Jury Selection	January 9, 2026 at 9:00am Dkt. 123
Jury Selection/Trial	January 12, 2026, at 9:00am Dkt. 123

1 Dated: May 24, 2024

By: /s/ John V. Picone III

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9 Dated: May 24, 2024

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PAYPAL, INC.

ATTESTATION

I hereby attest that I have obtained concurrence of the above noted signatories as indicated by the conformed signature (/s/) within this e-filed document.

/s/ Robert N. Kang
Robert N. Kang

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~~**[PROPOSED]**~~ **ORDER**

The above STIPULATED SCHEDULE is approved as the scheduling Order for this case and all parties shall comply with its provisions.

IT IS SO ORDERED.

Dated: May 27, 2024



Honorable Beth Labson Freeman
UNITED STATES DISTRICT JUDGE