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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CELLULAR SOUTH, INC.,)	Case Number: 4:25-cv-01487-YGR
)	
Plaintiff(s),)	
)	
vs.)	PROPOSED JOINT CASE
)	MANAGEMENT AND PRETRIAL
GOOGLE, LLC,)	ORDER AS MODIFIED
)	
Defendant(s).)	Complaint Filed: May 9, 2024
)	

Plaintiff Cellular South, Inc., (“CSF”) and Defendant Google, LLC (“Google”) (collectively “the Parties”) jointly submit this JOINT CASE MANAGEMENT AND PRETRIAL PROPOSED ORDER pursuant to the Court’s Directive in the Case Management Conference held on Monday, July 7, 2025, at 2:00 p.m. via ZOOM WEBINAR VIDEO CONFERENCE. (DKT 71 and 100). The following case management deadlines are jointly proposed by the Parties and incorporate deadlines ordered by the Court in the Pre-Trial Schedule contained in DKT 96, with one exception¹:

Event	Proposed Deadline
Initial Case Management Conference	Monday, July 7, 2025
Google to produce technical documentation regarding accused products	Wednesday, July 9, 2025
Deadline for Google to file Answer ²	Friday, July 11, 2025
Google to make source code available for inspection	Wednesday, July 23, 2025
Patent L.R. 3-1 Amended Infringement Contentions	Thursday, October 23, 2025
Patent L.R. 3-2 Document Production Accompanying Amended Infringement Contentions	Thursday, October 23, 2025
Patent L.R. 3-3 Invalidity Contentions	Thursday, November 20, 2025
Patent L.R. 3-4 Document Production Accompanying Invalidity Contentions	Thursday, November 20, 2025

¹ The Parties note that DKT 96 contains a February 26, 2026 date for disclosure of opening expert reports and a March 12, 2026 date for disclosure of rebuttal expert reports. The Parties understood these two dates to be contemplated as the dates for simultaneous filing of opening and rebuttal claim construction briefs, with expert deadlines to follow the *Markman* hearing. See DKT 100 at 4:24-5:3. This proposed schedule reflects the expert reports being due after this simultaneous claim construction brief filing and the *Markman* hearing.

² Google has agreed not to file a motion under Rule 12(b).

Event	Proposed Deadline
Patent L.R. 4-1 Exchange Terms for Construction	Thursday, December 11, 2025
Patent L.R. 4-2 Exchange Preliminary Constructions and Extrinsic Evidence	Thursday, January 8, 2026
Patent L.R. 3-8 Damages Contentions	Thursday, January 8, 2026
Patent L.R. 4-3 Joint Claim Construction and Prehearing Statement	Thursday, January 22, 2026
Patent L.R. 3-9 Responsive Damages Contentions	Thursday, February 5, 2025
Patent L.R. 4-4 Completion of Claim Construction Discovery	Thursday, February 5, 2026
Deadline for Parties to Amend Pleadings to Add Parties or Claims, Absent Good Cause	Thursday, February 5, 2026
Patent L.R. 4-5(a) Opening Claim Construction Briefs	Thursday, February 26, 2026
Patent L.R. 4-5(b) Responsive Claim Construction Briefs	Thursday, March 12, 2026
Patent L.R. 3-10 Damages Contention Meeting and Certification Due	Monday, April 6, 2026
Parties to file amended, final joint claim construction statement	Monday, April 6, 2026
Written Technology Synopsis and Tutorial	Wednesday, April 15, 2026 at 2:00 p.m.
Patent L.R. 4-6 Claim Construction Hearing	Wednesday, April 29, 2026 at 2:00 p.m.
Patent L.R. 3-7 Disclosures	30 days after the Court issues claim construction ruling

Event	Proposed Deadline
Completion of Fact Discovery	Thursday, June 11, 2026
Deadline to file motions to compel	Thursday, June 25, 2026
Deadline for parties to meet and confer re narrowing the number of asserted claims/invalidity grounds	Thursday June 25, 2026
Opening Expert Report on Issues as to which Party Bears the Burden of Proof	Thursday, July 16, 2026
Responsive Expert Reports	Thursday, August 20, 2026
Completion of Expert Discovery	Thursday, September 10, 2026
Deadline to file letter requesting a pre-filing conference regarding motion for summary judgment	Wednesday, September 16, 2026
Pre-filing conference on motion for summary judgment	Subject to court's availability, Friday, September 25, 2026
Deadline to File Summary Judgment & Daubert Motions	Thursday, October 1, 2026
Deadline to File Responsive Briefs to Summary Judgment & Daubert Motions	Thursday, October 15, 2026
Deadline to File Reply Briefs to Summary Judgment & Daubert Motions	Thursday, October 22, 2026
Summary Judgment & Daubert Hearing	Subject to court's availability, Tuesday, November 10, 2026 at 2:00 p.m.
Exchange of deposition and discovery-response designations	Thursday, December 10, 2026
Exchange of exhibits and exhibit list	Thursday, December 10, 2026

Event	Proposed Deadline
Exchange Counter-Designations and Objections to Deposition and Discovery Response Designations	Thursday, January 7, 2027
Exchange objections to exhibit list	Thursday, January 14, 2027
Exchange witness lists	Thursday, January 14, 2027
Parties Exchange Motions in Limine	Thursday, January 21, 2027
Deadline to meet and confer regarding Pretrial Conference Statement	Tuesday, January 26, 2027
Deadline to file Joint Statement confirming compliance with Pretrial meet and confer requirement	Friday, January 29, 2027
Compliance Hearing	Friday, February 5, 2027, at 9:01 a.m.
Pretrial Statement Deadline	Friday, February 12, 2027
Joint Trial Readiness Binder	Friday, February 19, 2027, by noon
Pretrial Conference	Friday, February 26, 2027 at 9:00 a.m.
Trial	Monday, March 15, 2027, at 8:30 a.m. (Jury Trial)

Pursuant to the Court's Pretrial Instructions in Civil Cases at Section 2, trial counsel shall meet and confer at least twenty-one (21) days in advance of the Pretrial Conference. The compliance hearing on Friday, February 5, 2027 at 9:01 a.m. is intended to confirm that counsel have reviewed the Court's Pretrial Setting Instructions and are in compliance therewith. The compliance hearing shall be held in the Federal Courthouse, 1301 Clay Street, Oakland, California, in Courtroom 1. Five (5) business days prior to the date of the compliance hearing, the parties shall file a one-page JOINT STATEMENT confirming they have complied with this requirement or explaining their failure to comply. If compliance is complete, the parties need not appear and the compliance hearing will be taken off calendar. Telephonic appearances will

be allowed if the parties have submitted a joint statement in a timely fashion. Failure to do so may result in sanctions.

Parties are advised that while the Court set a trial date in this action, the trial date may be advanced if the calendar opens. Said trial date will not be sooner than eight (8) weeks after the close of discovery.

Modification to the timing or extent of parties' discovery obligations under Fed. R. Civ. P. 26 and other applicable rules may be done pursuant to a separate Court Order. The parties are directed to submit a JOINT proposed order to the Court within five (5) business days following the date of the Case Management Conference which sets forward the modifications.

The parties must comply with both the Court's Standing Order in Civil Cases and Standing Order for Pretrial Instructions in Civil Cases for additional deadlines and procedures. All Standing Orders are available on the Court's website at <http://www.cand.uscourts.gov/ygrorders>.

Dated: July 25, 2025

/s/ Robert S. Hill

Counsel for plaintiff

Dated: July 25, 2025

/s/ Heidi L. Keefe

Counsel for defendant

SIGNATURE ATTESTATION

I hereby attest that signatories listed above, in the filing of this document has been obtained from each of the other signatories.

Dated: July 25, 2025

Holland & Knight LLP

By: /s/ Robert S. Hill
Robert S. Hill (SBN 276056)

*Attorney for Plaintiff
Cellular South, Inc*

IT IS SO ORDERED.

Dated: 8/5/25



YVONNE GONZALEZ ROGERS
United States District Court Judge

ADDITIONAL COUNSEL FOR
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