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Attorneys for Defendant
SAMSARA INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MOTIVE TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSARA INC.,

Defendant.

CASE NO. 24-CV-00902-JD

JOINT PROPOSED CASE SCHEDULE

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CASE NO. 24-cv-00902-JD

Pursuant to the Court's March 31, 2025 and April 23, 2025 orders (Dkts. 85, 88), Plaintiff Motive Technologies, Inc. ("Motive") and Defendant Samsara Inc. ("Samsara") propose the following case schedule (where the parties could not agree on a proposed date for a case event, each party provides its own proposal):

Case Event	Plaintiff's Proposed Date	Defendant's Proposed Date
Samsara's Answer and Counterclaims ¹	May 15, 2025	
Responses to Interrogatories and Requests for Production already served	May 27, 2025	
Rule 26(a)(1) Initial Disclosures	June 5, 2025	July 3, 2025
Revised Case Management Statement	June 5, 2025	July 3, 2025
Initial Case Management Conference	June 12, 2025 10:00 am	July 10, 2025 10:00 am
Motive's Amended Patent L.R. 3-1 and 3-2 Disclosures and Accompanying Document Production	May 29, 2025	July 24, 2025
Samsara's Patent L.R. 3-1 and 3-2 Disclosures and Accompanying Document Productions	May 29, 2025	July 24, 2025
Deadline to Amend the Pleadings/Add Parties	June 10, 2025 ²	
Patent L.R. 3-3 and 3-4 Invalidity Contentions	July 10, 2025	September 5, 2025
Patent L.R. 4-1 Exchange of Proposed Terms for Construction	July 24, 2025	September 19, 2025
Patent L.R. 4-2 Exchange of Preliminary Constructions and Extrinsic	August 14, 2025	October 10, 2025

¹ Samsara will file its Answer without prejudice to its pending motion to dismiss. Samsara intends to assert counterclaims for patent infringement against Motive.

² By agreeing to this date (proposed by Motive), Samsara does not waive its objections to any such amendment by Motive, including under Fed. R. Civ. P. 15.

1	Evidence		
2	Deadline to Request Leave to	August 25, 2025	October 21, 2025
3	Designate more than Ten Terms		
4	for Claim Construction		
5	Two Weeks before Joint Claim		
6	Construction Statement and		
7	Prehearing Statement per Claim		
8	Construction Standing Order R. 4		
9	Patent L.R. 3-8	August 29, 2025	October 24, 2025
10	Damages Contentions		
11	Patent L.R. 4-3	September 8, 2025	November 4, 2025
12	Joint Claim Construction		
13	Statement and Prehearing		
14	Statement		
15	Patent L.R. 3-9	September 26, 2025	November 21, 2025
16	Responsive Damages Contentions		
17	Patent L.R. 4-4	October 8, 2025	December 4, 2025
18	Close of Claim Construction		
19	Discovery		
20	Patent L.R. 4-5 (a)	October 23, 2025	December 19, 2025
21	Opening Claim Construction Brief		
22	Patent L.R. 4-5 (b)	November 6, 2025	January 9, 2026
23	Responsive Claim Construction		
24	Brief		
25	Written Technology Synopsis	November 17, 2025	January 22, 2026
26	7 days before Case Tutorial per		
27	Claim Construction Standing		
28	Order R. 8		
	Patent L.R. 4-5 (c)	November 13, 2025	January 16, 2026
	Reply Claim Construction Brief		
	Patent L.R. 3-10 Damages	November 25, 2025	January 20, 2026
	Contentions Meeting and		
	Certification		

1	Case Tutorial	November 24, 2025	January 29, 2026
2	One week prior to Claim		
3	Construction Hearing per Claim		
4	Construction Standing Order R. 8		
5	Claim Construction Hearing	December 4, 2025	February 5, 2026
6	Patent L.R. 3-7		TBD
7	Advice of Counsel Disclosure		(30 days following service of the Court's Claim Construction Ruling)
8			
9	Deadline to Substantially Complete Document Production	January 30, 2026	April 6, 2026
10	Non-Expert Discovery Cutoff	March 27, 2026	June 8, 2026
11			
12	Deadline to File Non-Expert Discovery Motions	April 3, 2026	June 15, 2026
13			
14	Expert Witness Disclosures (Burden)	May 1, 2026	July 15, 2026
15			
16	Expert Witness Disclosures (Non-Burden)	June 5, 2026	August 17, 2026
17	Joint Trial Setting Conference Statement		TBD
18	7 days before Trial Setting Conference per Standing Order for Civil Cases R. 3		
19			
20	Trial Setting Conference		TBD
21			
22	Expert Discovery Cut-off	July 1, 2026	September 18, 2026
23			
24	Deadline for Dispositive Motions and <i>Daubert</i> Motions	August 28, 2026	November 25, 2026
25			
26	Deadline for Oppositions to Dispositive Motions and <i>Daubert</i> Motions	October 2, 2026	December 23, 2026
27			
28	Deadline for Reply Briefs in Support of Dispositive Motions and <i>Daubert</i> Motions	November 6, 2026	January 13, 2027

1	Hearing on Dispositive Motions and <i>Daubert</i> Motions		TBD
2			
3	Pretrial Filings Including Paired Sets of Motions <i>In Limine</i> Deadline		TBD
4			
5	14 days before Final Pretrial Conference Per Standing Order for Civil Jury Trials R. 2		
6			
7	Final Pretrial Conference		TBD
8			
9	19 days before Trial per Standing Order for Civil Jury Trials R. 1		
10	Joint Filing of Deposition Testimony and Other Discovery Offered at Trial		TBD
11			
12	5 days before Trial per Standing Order for Civil Jury Trials R. 32		
13	Trial	Mid February 2027	Late April 2027
14	No more than 18 months from Initial Case Management Conference Per Standing Order for Civil Cases		
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1 DATED: April 25, 2025

Respectfully submitted,

2 /s/ David S. Bloch

/s/ Ali-Reza Boloori

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Ali-Reza Bolori, hereby attest, pursuant to N.D. Cal. Civil Local Rule 5-1(i)(3), that the concurrence to the filing of this document has been obtained from David S. Bloch, signatory hereto.

Dated: April 25, 2025

By: /s/ Ali-Reza Bolori
Ali-Reza Bolori