

EXHIBIT A

EXHIBIT A**PROPOSED CASE MANAGEMENT SCHEDULE**

<u>Event</u>	<u>Proposed Date/Deadline</u>
<u>Initial Disclosures of Both Parties (with no patent infringement counter-claim) / Commencement of Fact Discovery</u> (LPR 2.1, LPR 1.3)	5/9/25
<u>Initial Infringement Contentions</u> (LPR 2.2)	6/6/25
<u>Initial Non-Infringement, Unenforceability and Invalidity Contentions</u> (LPR 2.3)	7/11/25
<u>Initial Response To Invalidity Contentions</u> (LPR 2.5)	8/8/25
<u>Final Infringement, Unenforceability and Invalidity Contentions</u> (LPR 3.1)	10/31/25
<u>Deadline for Plaintiff to Amend Pleadings or Join Parties (without good cause)</u>	11/7/25
<u>Final Non-infringement, Enforceability and Validity Contentions</u> (LPR 3.2)	12/5/25
<u>Deadline for Defendant to Amend Pleadings or Join Parties (without good cause)</u>	12/12/25
<u>Exchange of Claim Terms Needing Construction and Proposed Construction</u> (LPR 4.1)	12/19/25
<u>Opening Claim Construction Brief</u> (LPR 4.2(a))	1/30/26
<u>Responsive Claim Construction Brief</u> (LPR 4.2(c))	2/27/26
<u>Reply Claim Construction Brief</u> (LPR 4.2(d))	3/13/26
<u>Joint Claim Construction Chart</u> (LPR 4.2(f))	3/20/26
<u>Claim Construction Hearing</u> (LPR 4.3)	4/17/26 or at the Court's convenience

<u>Event</u>	<u>Proposed Date/Deadline</u>
<u>Close of Fact Discovery</u> (LPR 1.3)	7/3/26 or 42 days after the claim construction ruling, whichever is later
<u>Expert Reports of Parties with Burden of Proof</u> (LPR 5.1(b))	7/31/26 or 28 days after the close of fact discovery, whichever is later
<u>Rebuttal Expert Reports</u> (LPR 5.1)	9/4/26 or 35 days after service of initial expert reports, whichever is later
<u>Completion of Expert Witness Depositions</u> (LPR 5.2)	10/9/26 or 35 days after service of rebuttal expert reports, whichever is later
<u>Final Day for Filing Dispositive Motions</u> (LPR 6.1)	11/6/26 or 28 days after the close of expert discovery, whichever is later
<u>Case Ready for Trial</u>	3/26/27 or 20 weeks after the filing of dispositive motions, whichever is later