IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE CHANBOND, LLC PATENT LITIGATION	)))))	C.A. No. 15-842 (RGA) CONSOLIDATED

STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and subject to the approval of the Court, that the following deadlines are hereby extended as set forth in the attached Exhibit A.

BAYARD, P.A.

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April 24, 2018

IT IS SO ORDERED this _____ day of _____, 2018.

_____
The Honorable Richard G. Andrews
United States District Judge

Patent Owner Ex. 2005

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Exhibit A

Event	Current Deadline	Proposed New Deadline
Close of fact discovery[1]	April 30, 2018	June 1, 2018
Opening Expert Reports for party that bears burden of proof	June 1, 2018	July 2, 2018
Rebuttal Expert Reports	July 13, 2018	August 13, 2018
Reply Expert Reports	August 3, 2018	August 31, 2018
Close of Expert Discovery	August 28, 2018	September 28, 2018
Opening SJ/Daubert Briefs	September 18, 2018	October 19, 2018
Answering SJ/Daubert Briefs	October 18, 2018	November 19, 2018
Reply SJ/Daubert Briefs	November 8, 2018	December 7, 2018
Trial scheduling conference, with parties to submit a joint status report with their proposal(s) one week in advance.[2]	October 31, 2018 @ 8:30 am	TBA
SJ/Daubert Hearing	TBA	TBA

[1] The parties agree that the close of fact discovery is extended for 30 days to complete already served discovery. The parties agree that no new discovery shall be served without the consent of the other party, except that the parties shall be permitted to serve new Requests for Admissions up through thirty days prior to the close of fact discovery. Nothing in this provision shall prevent a party from supplementing its response to any discovery request.

[2] Plaintiff intends to include a proposal regarding trial consolidation at least in view of identical accused products and common factual questions across defendants, per 35 U.S.C. § 299. Defendants believe consolidation for trial is not appropriate, for at least the reason that the parties cannot be properly consolidated under 35 U.S.C. § 299 and Fed. R. Civ. P. 20.

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Event	Current Deadline	Proposed New Deadline
Pre-trial Conference	TBA	TBA
First 5-day jury trial	TBA	TBA

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