

*The following are suggested deadlines that may be used in a proposed scheduling order/discovery plan.*

**OTHER DEADLINES REQUIRED GIVEN NATURE OF CASE:**

*Sample patent case deadlines:*

- A. Plaintiff(s)' infringement contentions: \_\_\_\_\_
- B. Defendant(s)' invalidity contentions: \_\_\_\_\_
- C. Exchange of terms and proposed constructions: \_\_\_\_\_
- D. Meet and confer on claim construction: \_\_\_\_\_
- E. Tutorial hearing ready date\*: \_\_\_\_\_
- F. Joint claim construction statement: \_\_\_\_\_
- G. Expert witness for claim construction:
  - 1. Opening expert reports for Markman: \_\_\_\_\_
  - 2. Rebuttal expert reports for Markman: \_\_\_\_\_
  - 3. Depositions of experts for Markman: \_\_\_\_\_
- H. Claim construction briefing for Markman:
  - 1. Opening Markman briefs: \_\_\_\_\_
  - 2. Rebuttal Markman briefs: \_\_\_\_\_
  - 3. Markman hearing ready date\*: \_\_\_\_\_
  - 4. Opinion of counsel defenses: \_\_\_\_\_

\*The hearing date and time will be decided by the court and scheduled by separate order.

*Sample class action deadlines (additional deadlines may be needed if the parties request phased discovery regarding certification):*

- A. Motion for class certification: \_\_\_\_\_
- B. Response to class certification motion: \_\_\_\_\_