

**SLINGSHOT V. CANON PROPOSED COMBINED CASE MANAGEMENT SCHEDULE
AND DISCOVERY PLAN WORKSHEET (CANON I AND CANON II)**

EVENT	DATE
TIER I PRE-SETTLEMENT DISCOVERY	
Initial Scheduling Conference	July 5, 2022
Rule 26(a)(1) Initial Disclosures (¶ 1)	Aug. 5, 2022
Slingshot's Disclosure of Asserted Claims and Preliminary Infringement Contentions (EDNY Local Patent Rule 6 – 45 days after scheduling conference)	Aug. 18, 2022
Filing of Joint Proposed Protective Order (¶ 3)	Aug. 26, 2022
Completion date for Phase I Discovery as agreed upon by the parties: (See paragraph 7 of joint letter requirement)	Oct. 7, 2022
Canon's Preliminary Invalidity Contentions (EDNY Local Patent Rule 6)	Oct. 17, 2022
Status conference TBD by the court: (Generally 15 days post Tier I Discovery)	Oct. 21, 2022
TIER II DISCOVERY AND MOTION PRACTICE	
Motion to join new parties or amend the pleadings: (Presumptively 15 days post status conference)	Dec. 2, 2022
Deadline for the Parties to Exchange List of Disputed Terms for Claim Construction	April 7, 2023
Deadline for the Parties to Meet and Confer Regarding Identification of Terms for Claim Construction	April 21, 2023
Deadlines for the Parties to File a Joint List of Disputed Terms for Claim Construction (EDNY Local Patent Rule 11)	May 19, 2023

EVENT	DATE
Parties' Opening Claim Construction Brief (EDNY Local Patent Rule 12)	June 16, 2023 (simultaneous briefs)
Parties' Answering Claim Construction Brief (EDNY Local Patent Rule 12)	July 14, 2023 (simultaneous briefs)
Parties' Reply Claim Construction Brief (EDNY Local Patent Rule 12)	July 21, 2023 (simultaneous briefs)
Deadline to Submit Technology Tutorial	Two weeks before the Court holds a claim construction hearing
Claim Construction Hearing [TBD]	[TBD]
Slingshot to Provide Final Infringement Contentions	November 17, 2023
Canon to Provide Final Invalidity Contentions	December 7, 2023
Canon to Provide Final Non-Infringement Contentions	December 14, 2023
Slingshot to Provide Final Validity Contentions	January 9, 2024
All fact discovery completed by: (Presumptively 9 months after deadline for joining parties/amend the pleadings)	Jan. 12, 2024
Opening Expert Reports	Feb. 23, 2024
Rebuttal Expert Reports	April 5, 2024
Reply Expert Reports	May 10, 2024
Expert discovery completed by: (Presumptively 3 months after close of fact discovery)	July 2, 2024
Final date to take first step in dispositive motion practice: (Parties are directed to consult the District Judge's individual rules regarding such motion practice. (Presumptively 30 days after close of discovery)	Aug. 30, 2024
Date to file <i>Daubert</i> Motions	Aug. 30, 2024
Responses to dispositive/Daubert Motions	Oct. 4, 2024
Replies on dispositive/Daubert Motions	Oct. 25, 2024

EVENT	DATE
Disclosure of trial witnesses/trial exhibits/deposition designations, submission of counter-designations	[Base on Trial Date]
Objections to trial witnesses/trial exhibits/deposition designations, submission of counter-designations	[Base on Trial Date]
Objections to counter-designations	[Base on Trial Date]
Joint Proposed Pretrial Order to be submitted: (30 days after dispositive motion practice deadline)	[Base on Trial Date]
Pretrial Conference	[COURT ASSIGNED BASED ON TRIAL DATE]
Trial	[COURT ASSIGNED]