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 *Daubert 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]