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**UNITED STATES DISTRICT COURT
DISTRICT OF NORTHERN CALIFORNIA**

APPLE INC.,

Plaintiff,

vs.

CHIAN CHIU LI,

Defendant.

) Case No. 3:22-cv-02956-TLT

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**STIPULATION AND ~~[PROPOSED]~~
ORDER AS MODIFIED TO EXTEND
PATENT CASE SCHEDULE**

JUDGE: Trina L. Thompson

1 Plaintiff Apple Inc. (“Apple”) and Defendant Chian Chiu Li (“Mr. Li”) (collectively
2 “Parties”) jointly submit this Stipulation and request for order to extend the remaining case
3 deadlines.

4 **WHEREAS**, on October 13, 2022, the Court issued a Scheduling Order (Dkt. No. 33) setting
5 forth the case schedule in this litigation;

6 **WHEREAS**, on October 27, 2022, Mr. Li filed an unopposed Motion to Extend Time of
7 Patent Case Schedule (“Motion for Extension”) (Dkt. No. 39) requesting a five-month extension to
8 each of the case deadlines;

9 **WHEREAS**, in Mr. Li’s Motion for Extension, he represented the extension was necessary
10 because he “needs more time to go through similar cases and collect supporting materials that are
11 available.” Dkt. No. 39 at 2.

12 **WHEREAS**, in Mr. Li’s Motion for Extension, he also represented that the Parties agree to
13 stay the case once Apple files its *inter partes* review (“IPR”) petition with the United States Patent
14 and Trademark Office. *Id.*

15 **WHEREAS**, the Parties remain in agreement that this case should be stayed upon Apple
16 filing its IPR petition and, once filed, the Parties intend to jointly move for a stay of this litigation
17 pending final disposition of Apple’s IPR petition.

18 **WHEREAS**, on November 1, 2022, the Court entered a Text Order (Dkt. No. 40) directing
19 the Parties to meet and confer and file a joint stipulation and proposed order setting a case schedule.

20 **NOW THEREFORE IT IS HEREBY STIPULATED** by and between Apple and Mr. Li
21 that the Court amend the current case schedule (Dkt. No. 33) to the proposed amended deadlines as
22 follows:
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Event	Deadline
Apple to serve invalidity contentions and accompanying document production [Pat. L.R. 3-3, 3-4]	May 15, 2023
Exchange of list of claim terms [Pat. L.R. 4-1]	May 29, 2023
Exchange of proposed constructions and extrinsic evidence [Pat. L.R. 4-2]	July 19, 2023
Mr. Li to serve damages contentions [Pat. L.R. 3-8]	July 3, 2023
Joint claim construction prehearing statement [Pat. L.R. 4-3]	July 13, 2023
Joint Case Management Statement for Interim Conference	July 17, 2023
Apple to serve rebuttal damages contentions [Pat. L.R. 3-9]	August 7, 2023
Party intending to rely on expert witness testimony to support proposed construction to serve claim construction expert report [Pat. L.R. 4-3]	September 29, 2023
Close of claim construction discovery [Pat. L.R. 4-4]	August 15, 2023
Mr. Li to file opening claim construction brief [Pat. L.R. 4-5(a)] Pre-recorded Case Tutorial	August 30, 2023
Apple to file responsive claim construction brief [Pat. L.R. 4-5(b)]	September 13, 2023
Mr. Li to file reply claim construction brief [Pat. L.R.4-5(c)]	September 20, 2023
Claim construction hearing and technology tutorial [Pat. L.R. 4-6]	October ¹⁰ 9, 2023
Advice of Counsel	30 days after Claim Construction Order

1 Dated: November 10, 2022

Respectfully Submitted

2 SHOOK, HARDY & BACON L.L.P.

3 By: /s/ Mark D. Schafer

4 *Attorney for Apple Inc.*

5 Dated: November 10, 2022

CHIAN CHIU LI

6 By: /s/ Chian Chiu Li

7 *Pro Se*

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10 **SIGNATURE ATTESTATION**

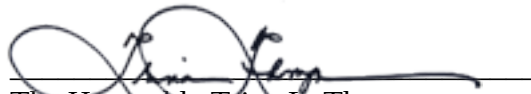
11 Pursuant to N.D. Cal. L.R. 5-1(h)(3), I, Mark D. Schafer, attest that I have obtained
12 authorization from the above signatories to file the above-referenced document. I declare under
13 penalty of perjury under the laws of the United States of America that the foregoing is true and
14 correct.

15 Executed: November 10, 2022

By: /s/ Mark D. Schafer

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19 **PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.**

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21 Dated: November 15, 2022 _____



22 The Honorable Trina L. Thompson
23 United States District Judge
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