

EXHIBIT A

Joint-Proposed Case Management Schedule

Existing Deadline	Proposed Deadline	Item
May 20, 2024	<i>To be determined subject to the convenience of the Court's schedule</i>	*Jury Selection – 9:00 a.m. in Marshall, Texas
7 days before Jury Selection		*Defendant to disclose final invalidity theories, final prior art references/combinations, and final equitable defenses.
10 days before Jury Selection		*Plaintiff to disclose final election of Asserted Claims. ¹
April 22, 2024	<i>To be determined subject to the convenience of the Court's schedule</i>	* If a juror questionnaire is to be used, an editable (in Microsoft Word format) questionnaire shall be jointly submitted to the Deputy Clerk in Charge by this date. ²
April 8, 2024	<i>To be determined subject to the convenience of the Court's schedule</i>	*Pretrial Conference – 9:00 a.m. in Marshall, Texas before Judge Rodney Gilstrap
April 1, 2024	September 4, 2024	*Notify Court of Agreements Reached During Meet and Confer. The parties are ordered to meet and confer on any outstanding objections or motions <i>in limine</i> . The parties shall advise the Court of any agreements reached no later than 1:00 p.m. three (3) business days before the pretrial conference.
April 1, 2024	September 4, 2024	*File Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Responses to Motions <i>in Limine</i> , Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations
March 26, 2024	August 27, 2024	*File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e-mail the Court Reporter, Shawn

¹ Given the Court's past experiences with litigants dropping claims and defenses during or on the eve of trial, the Court is of the opinion that these additional deadlines are necessary.

² The Parties are referred to the Court's Standing Order Regarding Use of Juror Questionnaires in Advance of *Voir Dire*.

Existing Deadline	Proposed Deadline	Item
		McRoberts, at shawn_microberts@txed.uscourts.gov.
March 18, 2024	August 20, 2024	File Motions <i>in Limine</i> The parties shall limit their motions <i>in limine</i> to issues that if improperly introduced at trial would be so prejudicial that the Court could not alleviate the prejudice by giving appropriate instructions to the jury.
March 18, 2024	August 20, 2024	Serve Objections to Rebuttal Pretrial Disclosures
March 12, 2024	August 13, 2024	Serve Objections to Pretrial Disclosures; and Serve Rebuttal Pretrial Disclosures
February 26, 2024	July 30, 2024	Serve Pretrial Disclosures (Witness List, Deposition Designations, and Exhibit List) by the Party with the Burden of Proof
February 13, 2024	July 16, 2024	*Response to Dispositive Motions (including <i>Daubert</i> Motions). Responses to dispositive motions that were filed prior to the dispositive motion deadline, including <i>Daubert</i> Motions, shall be due in accordance with Local Rule CV-7(e), not to exceed the deadline as set forth in this Docket Control Order. ³ Motions for Summary Judgment shall comply with Local Rule CV-56.
January 31, 2024	July 2, 2024	*File Motions to Strike Expert Testimony (including <i>Daubert</i> Motions) No motion to strike expert testimony (including a <i>Daubert</i> motion) may be filed after this date without leave of the Court.
January 31, 2024	July 2, 2024	*File Dispositive Motions No dispositive motion may be filed after this date without leave of the Court.

³ The parties are directed to Local Rule CV-7(d), which provides in part that “[a] party’s failure to oppose a motion in the manner prescribed herein creates a presumption that the party does not controvert the facts set out by movant and has no evidence to offer in opposition to the motion.” If the deadline under Local Rule CV 7(e) exceeds the deadline for Response to Dispositive Motions, the deadline for Response to Dispositive Motions controls.

Existing Deadline	Proposed Deadline	Item
		Motions shall comply with Local Rule CV-56 and Local Rule CV-7. Motions to extend page limits will only be granted in exceptional circumstances. Exceptional circumstances require more than agreement among the parties.
January 24, 2024	June 25, 2024	Deadline to Complete Expert Discovery
January 10, 2024	June 13, 2024	Serve Disclosures for Rebuttal Expert Witnesses
January 3, 2024	June 6, 2024	Deadline to File Motions to Compel Discovery
December 20, 2023	May 23, 2024	Deadline to Complete Fact Discovery
December 20, 2023	May 23, 2024	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
	May 23, 2024	Deadline for Cisco to reduce invalidity grounds to no more than 6 prior art references per patent from among the twelve prior art references previously identified for that particular patent and no more than a total of 20 prior art references . Each obviousness combination counts as a separate prior art reference.
December 6, 2023	May 6, 2024	Comply with P.R. 3-7 (Opinion of Counsel Defenses)
	April 25, 2024	Deadline for Netsocket to reduce asserted claims to no more than 5 asserted claims per patent from among the ten previously identified claims and no more than a total of 16 claims
November 9, 2023	<i>To be determined subject to the convenience of the Court's schedule</i>	*Claim Construction Hearing in Marshall, Texas before Judge Rodney Gilstrap

Existing Deadline	Proposed Deadline	Item
November 1, 2023	April 4, 2024	*Comply with P.R. 4-5(d) (Joint Claim Construction Chart)
October 25, 2023	March 28, 2024	*Comply with P.R. 4-5(c) (Reply Claim Construction Brief)
October 18, 2023	March 21, 2024	Comply with P.R. 4-5(b) (Responsive Claim Construction Brief)
	March 15, 2024	Deadline for Cisco to reduce invalidity grounds to no more than 12 prior art references per patent and no more than a total of 40 prior art references from among the sixty-two prior art references previously identified. Each obviousness combination counts as a separate prior art reference.
October 4, 2023	March 7, 2024	Comply with P.R. 4-5(a) (Opening Claim Construction Brief) and Submit Technical Tutorials (if any) Good cause must be shown to submit technical tutorials after the deadline to comply with P.R. 4-5(a).
October 4, 2023	March 7, 2024	Deadline to Substantially Complete Document Production and Exchange Privilege Logs Counsel are expected to make good faith efforts to produce all required documents as soon as they are available and not wait until the substantial completion deadline.
September 20, 2023	March 1, 2024	Comply with P.R. 4-4 (Deadline to Complete Claim Construction Discovery)
	March 1, 2024	Deadline for Netsocket to reduce asserted claims to no more than 10 claims per patent and no more than a total of 32 claims
September 13, 2023	February 15, 2024	File Response to Amended Pleadings
August 30, 2023	February 1, 2024	*File Amended Pleadings It is not necessary to seek leave of Court to amend pleadings prior to this deadline unless the amendment seeks to assert additional patents.
August 23, 2023	January 25, 2024	Comply with P.R. 4-3 (Joint Claim Construction Statement)

Existing Deadline	Proposed Deadline	Item
August 2, 2023	January 4, 2024	Comply with P.R. 4-2 (Exchange Preliminary Claim Constructions)
	December 21, 2023	Deadline for Cisco to reduce invalidity grounds to 62 prior art references total. Each obviousness combination counts as a separate prior art reference.
	November 30, 2023	Deadline for Netsocket to reduce asserted claims to 50 claims total