

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENGST SE,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,

Defendant.

Case No. 23-cv-00794

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

JOINT MOTION TO AMEND THE SCHEDULING ORDER

Plaintiff Hengst SE and Defendant Champion Laboratories, Inc. (collectively, the “Parties”), jointly move for an amendment to the Scheduling Order entered by the Court on December 20, 2023 (Dkt. 20).

The Parties have been actively engaged in discovery, including written discovery and document productions. However, the Parties require additional time to schedule and take depositions, and propose extending the fact discovery deadline to accommodate the parties’ deposition schedule. The Parties further propose a corresponding extension in the claim construction briefing, to follow the revised schedule for fact depositions. Accordingly, the Parties hereby request an extension in the case schedule as follows:

Event	Current Deadline	Proposed Deadline
Parties to Meet and Confer on Claim Terms	March 4, 2024	
Close of Fact Discovery	March 26, 2024	April 15, 2024
Defendant’s Opening Claim Construction Brief	April 2, 2024	April 22, 2024

Plaintiff's Response	April 30, 2024	May 20, 2024
Defendant's Reply	May 13, 2024	June 3, 2024
Joint Claim Construction Chart	May 20, 2024	June 10, 2024

Dated this 28th day of February 2024.

Respectfully submitted,

/s/ Justin T. Joseph

Kevin W. Guynn
Patrick J. Smith
Justin T. Joseph
Andrew D. Burnham
Greer, Burns & Crain, Ltd.
300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
312.360.0080 / 312.360.9315 (facsimile)
kguynn@gbc.law
psmith@gbc.law
jjoseph@gbc.law
aburnham@gbc.law

Counsel for Plaintiff Hengst SE

/s/ David A. Nelson

Dave A. Nelson
Athena D. Dalton
Quinn Emanuel Urquhart & Sullivan LLP
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400

Matthew D. Robson (*pro hac vice*)
James Glass (*pro hac vice*)
Quinn Emanuel Urquhart & Sullivan LLP
New York, NY 10010
Tel: (312) 849-7000

Counsel for Champion Laboratories, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENGST SE,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,

Defendant.

Case No. 23-cv-00794

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

AMENDED SCHEDULING ORDER

Plaintiff Hengst SE and Champion Laboratories, Inc. (collectively, the “Parties”) filed a Joint Stipulation Relating to the Scheduling Order. After reviewing the Parties’ filing, this Court hereby amends the Scheduling Order entered on December 20, 2023, as follows:

Event	Prior Deadline	New Deadline
Parties to Meet and Confer on Claim Terms	March 4, 2024	
Close of Fact Discovery	March 26, 2024	April 30, 2024
Defendant’s Opening Claim Construction Brief	April 2, 2024	May 7, 2024
Plaintiff’s Response	April 30, 2024	June 4, 2024
Defendant’s Reply	May 13, 2024	June 18, 2024
Joint Claim Construction Chart	May 20, 2024	June 25, 2024

SO ORDERED:

Sara L. Ellis
United States District Judge

Dated:

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENGST SE,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,

Defendant.

Case No. 23-cv-00794

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

AMENDED SCHEDULING ORDER

Plaintiff Hengst SE and Champion Laboratories, Inc. (collectively, the “Parties”) filed a Joint Stipulation Relating to the Scheduling Order. After reviewing the Parties’ filing, this Court hereby amends the Scheduling Order entered on April 10, 2023, as follows:

Event	Prior Deadline	Current Deadline
Final Infringement Contentions (List)	October 2, 2023	January 2, 2024
Final Infringement Contentions (Table)	October 16, 2023	January 16, 2024
Final Unenforceability and Invalidity Contentions	October 16, 2023	January 16, 2024
Final Non-Infringement Contentions	November 13, 2023	February 13, 2024
Final Enforceability and Validity Contentions	November 13, 2023	February 13, 2023
Parties to Exchange Claim Construction Terms	November 27, 2023	February 27, 2024
Parties to Meet and Confer on Claim Terms	December 4, 2023	March 4, 2024
Close of Fact Discovery	December 26, 2023	March 26, 2023
Defendant’s Opening Claim Construction Brief	January 2, 2024	April 2, 2024
Plaintiff’s Response	January 30, 2024	April 30, 2024

Defendant's Reply	February 13, 2024	May 13, 2024
Joint Claim Construction Chart	February 20, 2024	May 20, 2024

The Court strikes the status date set for March 22, 2024 and resets it to July 15, 2024 at 10:00 AM for the claim construction hearing.

SO ORDERED:



Sara L. Ellis
United States District Judge

Dated: December 20, 2023