IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHARKNINJA OPERATING LLC, SHARKNINJA SALES COMPANY, OMACHRON ALPHA INC., and OMACHRON INTELLECTUAL PROPERTY INC. *Plaintiffs* v. DYSON, INC. and DYSON TECHNOLOGY LIMITED, *Defendants*	C.A. No. 1:23-cv-12372-ADB **JURY TRIAL DEMANDED**

THE PARTIES' REVISED PROPOSED SCHEDULE

Pursuant to Rule 16.6 of the Local Civil Rules for the District of Massachusetts, this Court's Order (ECF No. 84), and instruction during the Parties' November 8, 2023, Initial Scheduling Conference, Plaintiffs SharkNinja Operating LLC, SharkNinja Sales Company, Omachron Alpha Inc., and Omachron Intellectual Property Inc. (collectively, "Plaintiffs" or "SharkNinja") and Defendants Dyson, Inc. and Dyson Technology Limited ("Dyson") (collectively, the "Parties"), by and through their undersigned counsel, submit the following revised proposed schedule and memorialization of the Court's instruction regarding discovery limitations joint discovery plan.

I. PROPOSED SCHEDULE

Event	Joint Proposed Date
Parties Submit Proposed Protective Order Parties Submit Proposed ESI Discovery Protocol	Friday, December 8, 2023
Deadline for Patentee's Preliminary Patent-Related Disclosures Pursuant to Local Rule 16.6(d)(1)	Friday, December 15, 2023

Event	Joint Proposed Date
Deadline for Conference Concerning Preliminary Patent Disclosures Pursuant to Local Rule 16.6(d)(2)	Wednesday, January 10, 2024
Deadline for Accused Infringer's Preliminary Production of Technical Documents, Source Code, and Samples of Accused Products Pursuant to Local Rule 16.6(d)(4)(A-D)	Wednesday, January 31, 2024
Deadline for Accused Infringer's Invalidity Claim Charts Pursuant to Local Rule 16.6(d)(4)(E)	Friday, March 15, 2024
Deadline for Simultaneous Exchange of Claim Terms to Be Construed and Their Proposed Claim Constructions Pursuant to Local Rule 16.6(e)(1)(A)	Friday, April 5, 2024
Deadline for Conference Concerning Claim Construction Pursuant to Local Rule 16.6(e)(1)(B)	Friday, April 12, 2024
Deadline for Joint Statement of the Number of Claims and Terms to be Construed and Their Proposed Constructions Pursuant to Local Rule 16.6(e)(1)(D)	Friday, April 19, 2024
Deadline for Simultaneous Exchange of Opening Claim Construction Briefs pursuant to Local Rule 16.6(e)(2)	Friday, May 10, 2024
Deadline for Amending Pleadings and Joinder of Additional Parties Without Leave of Court	Friday, May 10, 2024
Deadline for Simultaneous Exchange of Responsive Claim Construction Briefs pursuant to Local Rule 16.6(e)(4)	Friday, June 21, 2024
Deadline to Submit Tutorials, if any, to the Court pursuant to Local Rule 16.6(e)(6)	14 days before the claim construction hearing
Claim Construction Hearing	On or about Tuesday, July 16, 2024, at the Court's convenience
Substantial Completion of Document Production	Friday, July 19, 2024
Fact Discovery Closes	Monday, September 23, 2024
Deadline to Serve Opening Expert Reports on Issues Where the Party Bears the Burden of Proof	Friday, October 25, 2024
Deadline to Serve Rebuttal Expert Reports on Issues Where the Party Does Not Bear the Burden of Proof	Friday, November 22, 2024
Expert Discovery Closes	Friday, December 20, 2024

Event	Joint Proposed Date
Deadline for Filing Dispositive Motions (including *Daubert*)	Friday, February 14, 2025
Deadline for Response to Dispositive Motions	Friday, April 11, 2025
Deadline for Replies re: Dispositive Motions	Friday, May 9, 2025
Pretrial Conference	On or about Monday, June 16, 2025, at the Court's convenience
Trial	On or about Monday, July 21, 2025, at the Court's convenience

II. JOINT DISCOVERY PLAN

A. Discovery Limitations

1. Requests for Admissions – 25 per side

2. Requests for Production – up to 2 separate sets per side

3. Interrogatories – 25 per side

4. Depositions – 15 per side

Dated: December 1, 2023

By: */s/* Jay Emerick

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 1, 2023.

/s/ Joseph J. Mueller