

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KT IMAGING USA, LLC,

Plaintiff,

v.

REOLINK DIGITAL TECHNOLOGY
CO., LTD.,

Defendant.

Civil Action No.: 6:22-cv-00876-ADA

JOINT STIPULATION TO AMEND SCHEDULING ORDER

Pursuant to Judge Albright’s Amended Standing Order Regarding Joint Or Unopposed Request to Change Deadlines (March 7, 2022), Plaintiff KT Imaging USA, LLC and Defendant Reolink Digital Technology Co., Ltd. (collectively, “Parties”), respectfully request the Court to enter the attached agreed Amended Scheduling Order. This request is (1) agreed to between the Parties; (2) does not change the date of any hearing, trial, or other Court date; and (3) does not extend any deadline of a final submission that affects the Court’s ability to hold a scheduled hearing, trial, or Court event. The Amended Scheduling Order modifies the deadline to serve Final Infringement and Invalidity Contentions from May 23, 2024 to July 18, 2024.

Dated: May 13, 2024

Respectfully submitted,

By: /s/ Brandon G. Moore

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AGREED AMENDED SCHEDULING ORDER

Pursuant to Rule 16, Federal Rules of Civil Procedure, the Court ORDERS that the following schedule will govern deadlines up to and including the trial of this matter:

Current Deadline	New Deadline	Item
March 18, 2024	March 18, 2024	Parties submit optional technical tutorials to the Court and technical advisor (if appointed)
March 28, 2024	March 28, 2024	<i>Markman Hearing</i> at 10:00 a.m. This date is a placeholder and the Court may adjust this date as the <i>Markman</i> hearing approaches.
March 29, 2024	March 29, 2024	Fact Discovery opens; deadline to serve Initial Disclosures per Rule 26(a).
May 09, 2024	May 09, 2024	Deadline to add parties.
May 23, 2024	July 18, 2024	Deadline to serve Final Infringement and Invalidity Contentions. After this date, leave of Court is required for any amendment to infringement or invalidity contentions. This deadline does not relieve

Current Deadline	New Deadline	Item
July 18, 2024	July 18, 2024	Deadline to amend pleadings. A motion is not required unless the amendment adds patents or patent claims. (Note: This includes amendments in response to a 12(c) motion.)
September 26, 2024	September 26, 2024	Deadline for the first of two meet and confers to discuss significantly narrowing the number of claims asserted and prior art references at issue. Unless the parties agree to the narrowing, they are ordered to contact the Court's law clerk to arrange a teleconference with the Court to resolve the disputed issues.
October 24, 2024	October 24, 2024	Close of Fact Discovery.
October 31, 2024	October 31, 2024	Opening Expert Reports.
December 2, 2024	December 2, 2024	Rebuttal Expert Reports.
December 19, 2024	December 19, 2024	Close of Expert Discovery.
January 9, 2025	January 9, 2025	Deadline for the second of two meet and confers to discuss narrowing the number of claims asserted and prior art references at issue to triable limits. If it helps the parties determine these limits, the parties are encouraged to contact the Court's law clerk for an estimate of the amount of trial time anticipated per side. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer.
January 16, 2025	January 16, 2025	Dispositive motion deadline and Daubert motion deadline. See General Issues Note #7 regarding providing copies of the briefing to the Court and the technical advisor (if appointed).
January 30, 2025	January 30, 2025	Serve Pretrial Disclosures (jury instructions, exhibits lists, witness lists, discovery and deposition designations).
February 13, 2025	February 13, 2025	Serve objections to pretrial disclosures/rebuttal disclosures.

Current Deadline	New Deadline	Item
February 13, 2025	February 13, 2025	Parties to jointly email the Court's law clerk (<i>See</i> OGP at 1) to confirm their pretrial conference and trial dates
February 20, 2025	February 20, 2025	Serve objections to rebuttal disclosures; file Motions <i>in limine</i> .
February 27, 2025	February 27, 2025	File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibits lists, witness lists, discovery and deposition designations); file oppositions to motions <i>in limine</i> .
March 6, 2025	March 6, 2025	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 email the Court Reporter, Kristie Davis at kmdaviscsr@yahoo.com Deadline to file replies in motions <i>in limine</i> .
March 6, 2025	March 6, 2025	Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> .
March 17, 2025	March 17, 2025	File joint notice identifying remaining objections to pretrial disclosures and disputes on motions <i>in limine</i> .
March 20, 2025	March 20, 2025	Final Pretrial Conference. Held in person unless otherwise requested.
April 14, 2025	April 14, 2025	Jury Selection/Trial.

Dated:_____

ALAN D ALBRIGHT
UNITED STATES DISTRICT JUDGE