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PAYPAL, INC.

12
13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

16
17 ECARDLESS BANCORP, LTD.,

18 Plaintiff,

19 v.

20 PAYPAL, INC.,

21 Defendant.
22

Case No. 5:24-cv-01054-BLF

23 **STIPULATED SCHEDULE AND ~~PROPOSED~~**
24 **ORDER**

25 Date: May 24, 2024

26 Judge: The Honorable
27 Beth Labson Freeman
28

STIPULATED SCHEDULE
CASE NO. 5:24-cv-01054-BLF

Pursuant to the Court's Case Management Order (Dkt. 123), Plaintiff eCardless Bancorp, Ltd. ("eCardless") and Defendant PayPal, Inc. ("PayPal") (collectively, the "Parties") jointly propose and respectfully submit the following schedule:

Event	Stipulated Date
Deadline for eCardless to Comply with P.L.R. 3-1 (Disclosure of Asserted Claims and Infringement Contentions)	June 3, 2024
Deadline for PayPal to Answer or Respond to the Complaint	June 3, 2024 Agreed; JCMS, Dkt. 117-3
Deadline for PayPal to File any Motion to Dismiss	June 3, 2024
Deadline for eCardless to File Opposition to Motion to Dismiss	June 17, 2024
Deadline for PayPal to File Reply to Opposition to Motion to Dismiss	June 24, 2024
Last Day to Request Leave to Amend the Pleadings per F.R. Civ. P. 15	July 2, 2024 Dkt. 123
PayPal's Deadline to Comply with P.L.R. 3-3 (Invalidity Contentions)	July 3, 2024

1	Deadline to Comply with P.L.R. 4-3	July 3, 2024
2	(Joint Claim Construction and Prehearing Statement)	
3	Deadline for PayPal to File Opening Claim Construction Brief	July 5, 2024 Transcript at 28:7–8
4	Deadline to File Case Management Statement	July 11, 2024 Dkt. 123
5	Subsequent Case Management Conference	July 18, 2024, at 11:00am Dkt. 123
6	Deadline for eCardless to File Opposition Construction Brief	August 2, 2024 Transcript at 28:8–9
7	eCardless' Deadline to Comply with P.L.R. 3-8 (Damages Contentions)	August 20, 2024
8	Deadline for PayPal to File Reply Claim Construction Brief	August 23, 2024 Transcript at 28:9
9	Deadline for PayPal to Comply with P.L.R. 3-9 (Responsive Damages Contentions)	September 20, 2024
10	Claims Tutorial	October 4, 2024, at 9:00am Dkt. 123

1		October 11, 2024, at 9:00am
2	<i>Markman</i> Hearing	Dkt. 123
3		
4	Deadline to Comply with	
5	P.L.R. 3-10	
6	(Damages Contentions	November 19, 2024
7	Meeting and	
8	Certification)	
9		
10	Close of Fact Discovery	January 17, 2025
11		
12	Deadline to Complete	February 28, 2025
13	Settlement Conference	
14	with Magistrate Judge	Dkt. 123
15		
16	Opening Expert Reports	March 30, 2025
17		
18	Rebuttal Expert Reports	April 30, 2025
19		
20	Close of Expert	
21	Discovery	May 30, 2025
22		
23	Last Day to File	
24	Dispositive Motions	June 27, 2025
25		
26	Deadline to File	
27	Oppositions to	July 25, 2025
28	Dispositive Motions	
	Deadline to File Reply to	
	Dispositive Motions	August 15, 2025
	Last Day to Hear	September 18, 2025, at 9:00am
	Dispositive Motions	Dkt. 123
	Pretrial Conference	December 18, 2025, at 1:30pm
		Dkt. 123

Jury Selection	January 9, 2026 at 9:00am Dkt. 123
Jury Selection/Trial	January 12, 2026, at 9:00am Dkt. 123

1 Dated: May 24, 2024

By: /s/ John V. Picone III

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9 Dated: May 24, 2024

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ATTESTATION

I hereby attest that I have obtained concurrence of the above noted signatories as indicated by the conformed signature (/s/) within this e-filed document.

/s/ Robert N. Kang
Robert N. Kang

~~PROPOSED~~ ORDER

The above STIPULATED SCHEDULE is approved as the scheduling Order for this case and all parties shall comply with its provisions.

IT IS SO ORDERED.

Dated: May 27, 2024



Honorable Beth Labson Freeman
UNITED STATES DISTRICT JUDGE