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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ECARDLESS BANCORP, LTD., Plaintiff, v. PAYPAL, INC., Defendant.	Case No. 5:24-cv-01054-BLF **STIPULATED SCHEDULE AND [~~PROPOSED~~] ORDER** Date: May 24, 2024 Judge: The Honorable Beth Labson Freeman

Google Exhibit 1166
Google v. VirtaMove
IPR2025-00488

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

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

Markman Hearing	October 11, 2024, at 9:00am Dkt. 123
Deadline to Comply with P.L.R. 3-10 (Damages Contentions Meeting and Certification)	November 19, 2024
Close of Fact Discovery	January 17, 2025
Deadline to Complete Settlement Conference with Magistrate Judge	February 28, 2025 Dkt. 123
Opening Expert Reports	March 30, 2025
Rebuttal Expert Reports	April 30, 2025
Close of Expert Discovery	May 30, 2025
Last Day to File Dispositive Motions	June 27, 2025
Deadline to File Oppositions to Dispositive Motions	July 25, 2025
Deadline to File Reply to Dispositive Motions	August 15, 2025
Last Day to Hear Dispositive Motions	September 18, 2025, at 9:00am 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

Dated: May 24, 2024

By: */s/ John V. Picone III*

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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