

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ZAXCOM, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 1:23-cv-1245-JFM
v.	)	
	)	
	)	
RØDE MICROPHONES, LLC. and	)	
FREEDMAN ELECTRONICS PTY LTD.,	)	
	)	
Defendants.	)	

STIPULATION TO AMEND THE SCHEDULING ORDER

Pursuant to the Court’s Order Granting the Parties’ Stipulation to Amend the Scheduling Order (D.I. 132), Plaintiff Zaxcom, Inc.’s (“Zaxcom”) Reply Claim Construction Brief is presently due May 16, 2025, and Defendants’ Sur-Reply Claim Construction Brief is due June 6, 2025.

WHEREAS the Defendants served their Responsive Claim Construction Brief on April 25, 2025, and Plaintiff subsequently filed Sur-Reply Briefing at the Patent Trial and Appeal Board on April 28, 2025, in IPR2025-00230, IPR2025-00231, and IPR2025-00232, which are IPRs for asserted patents 7,711,443; 7,929,902; and 10,276,207, respectively.

WHEREAS Defendants contend that Plaintiff made statements regarding the meaning of “master timecode generator” and “master timecodes” in its IPR sur-reply briefing that are relevant to the proper interpretation of these claim terms.

WHEREAS Defendants notified Plaintiff that they intended to move the Court for leave to file an amended Joint Claim Construction Chart (“JCCC”) to modify their proposed claim constructions for “master timecode generator” and “master timecodes” in view of Plaintiff’s IPR statements;

WHEREAS the parties met and conferred and agreed that: (1) Plaintiff does not oppose Defendants' amendment of its claim constructions for "master timecode generator" and "master timecodes" and submission of same in an amended JCCC, (2) the dates of the Plaintiff's Reply Claim Construction Brief and Defendants' Sur-Reply Claim Construction Brief would each be extended by seven days to accommodate briefing on the new issues; and (3) the parties would receive an additional 350 words for their respective Reply and Sur-Reply Briefs to address the new issues raised by the amended claim constructions;

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties and subject to the Court's approval, that the due dates for the remaining claim construction briefs shall be amended as follows, that an amended JCCC may be filed by the date below, and that the parties shall receive an additional 350 words for their respective Reply and Sur-Reply.

Event	Current Deadline	Proposed Deadline
Zaxcom's Reply Claim Construction Br.	May 16, 2025	May 23, 2025
Defendants' Sur-Reply Claim Construction Br.	June 6, 2025	June 13, 2025
Amended Joint Claim Construction Chart	n/a	June 20, 2025
Joint Claim Construction Brief	June 20, 2025	No change
Claim Construction Hearing	July 9, 2025	No change

Respectfully submitted,

Dated: May 16, 2025

Of Counsel:

Rita C. Chipperson
CHIPPERSON LAW GROUP, P.C.
163 Madison Avenue, Suite 220-40
Morristown, New Jersey 07960
973-845-9071
rcc@chippersonlaw.com

O'KELLY & O'ROURKE, LLC

/s/ Gerard M. O'Rourke
Gerard M. O'Rourke (No. 3265)
Sean T. O'Kelly (No. 4349)
824 North Market Street, Suite 1001A
Wilmington, DE 19801
(302) 778-4000
gorourke@okorlaw.com
sokelly@okorlaw.com

Attorneys for Plaintiff

Of Counsel:

Martin J. Black
Michael H. McGinley
Michael A. Fisher
Jeffrey S. Edwards
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
(215) 994-4000

/s/ Emily S. DiBenedetto
Nathan R. Hoeschen (No. 6232)
Emily S. DiBenedetto (No. 6779)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
nhoeschen@shawkeller.com
edibenedetto@shawkeller.com

Attorneys for Defendants

Jeffrey B. Plies
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, TX 78701
(512) 394-3000

SO ORDERED this 16th day of May, 2025.



Honorable John F. Murphy
UNITED STATES DISTRICT JUDGE