IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

AUDIO POD IP, LLC, Plaintiff, v. AMAZON.COM, INC.; AMAZON.COM LLC; AMAZON WEB SERVICES, INC., and AUDIBLE, INC. Defendants.	Lead Civil Action No. 3:24cv00406 (RCY) **JURY TRIAL DEMANDED**

JOINT PROPOSED SCHEDULING ORDER

Pursuant to the Court's order (Dkt. 52), the parties jointly propose the following agreed upon schedule. All dates marked with an asterisk (*) are to occur on the first Wednesday coinciding with or following the indicated date.

Event	**Proposed Date**
File Answer	If necessary, after decisions on motions to dismiss.
Exchange Claim Terms for Construction	April 9, 2025
Exchange Constructions and Support	April 16, 2025
Meet and Confer regarding Constructions	April 23, 2025
File Joint Claim Construction Chart	April 30, 2025
Serve Opening Expert Claim Construction Declaration (for Party Proposing Construction Other than Plain and Ordinary Meaning)	April 30, 2025

Audio Pod EX2019
Amazon v. Audio Pod
IPR2025-00765

Event	**Proposed Date**
Serve Rebuttal Expert Claim Construction Declaration	May 21, 2025
Serve Reply Expert Claim Construction Declaration	May 28, 2025
Serve Sur-Reply Expert Claim Construction Declaration	June 4, 2025
Conclude Expert Claim Construction Depositions (one deposition per expert)	June 13, 2025
File Opening Claim Construction Briefs (Simultaneous)	June 25, 2025
File Responsive Claim Construction Briefs (Simultaneous)	July 23, 2025
Markman Hearing (estimated)	Mid-August
Markman Order	X
Deadline to Amend Pleadings	X+4 weeks*
Exchange Privilege Logs	X+4 weeks*
Close of Fact Discovery	X+6 weeks*
Serve Opening Expert Disclosures	X+10 weeks*
Serve Rebuttal Expert Disclosures	X+16 weeks*
Conclude Expert Depositions	X+18 weeks*
File Dispositive Motions & *Daubert* Motions	X+22 weeks*
File Rule 26(a)(3) Disclosures & Motions in Limine	X+24 weeks*
File Objections to Rule 26(a)(3) Disclosures & Oppositions to Motions in Limine	X+27 weeks*
File Oppositions to Dispositive Motions & *Daubert* Motions	X+26 weeks*

Event	Proposed Date
File Replies In Support of Dispositive Motions & *Daubert* Motions	X+28 weeks*

Dated: January 28, 2025

Respectfully submitted,

/s/ Chandran B. Iyer
Ronald M. Daignault (*pro hac vice*)*
Chandran B. Iyer (VA Bar No. 94100)
Steven J. Reynolds (*pro hac vice*)*
Hoda Rifai-Bashjawish (*pro hac vice*)*
Kevin H. Sprenger (VA Bar No. 98588)
Matthew Harkins (*pro hac vice*)*
rdaignault@daignaultiyer.com
cbiyer@daignaultiyer.com
sreynolds@daignaultiyer.com
hrifai-bashjawish@daignaultiyer.com
ksprenger@daignaultiyer.com
mharkins@daignaultiyer.com
DAIGNAULT IYER LLP
8229 Boone Boulevard – Suite 450
Vienna, VA 22182
Tel.: (202) 330-1666

Attorneys for Plaintiff Audio Pod IP, LLC

**Not admitted to practice in Virginia*

/s/ William R. Poynter
William R. Poynter (VA Bar No. 48672)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach VA 23462
wpoynter@kaleolegal.com
Tel: (757) 238-6383
Fax : (757) 304-6175

Andrea L. Cheek (VA Bar No. 80331)
KNOBBE, MARTENS, OLSON & BEAR, LLP
1717 Pennsylvania Ave. N.W., Ste. 900
Washington D.C. 20006
andrea.cheek@knobbe.com

Joseph R. Re (*pro hac vice*)
Jeremy A. Anapol (*pro hac vice*)
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, 14th Floor
Irvine, CA 92614
joe.re@knobbe.com
jeremy.anapol@knobbe.com

Colin B. Heidman (*pro hac vice*)
Christie R.W. Matthaei (*pro hac vice*)
KNOBBE, MARTENS, OLSON & BEAR, LLP
925 4th Ave, Ste 2500
Seattle, WA 98104
colin.heideman@knobbe.com
christie.matthaei@knobbe.com

Counsel for Defendants Amazon.com, Inc., Amazon.com LLC, Amazon Web Services, Inc., and Audible, Inc.

CERTIFICATE OF SERVICE

I certify that on January 28, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: */s/ Chandran B. Iyer*

Chandran B. Iyer (VA Bar No. 94100)
cbiyer@daignaultiyer.com
DAIGNAULT IYER LLP
8229 Boone Boulevard – Suite 450
Vienna, VA 22182
Tel.: (202) 330-1666

Attorney for Plaintiff Audio Pod IP, LLC