

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

ALIGN TECHNOLOGY, INC.,

Plaintiff,

v.

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC., INSTITUT
STRAUMANN AG, & STRAUMANN USA, LLC

Defendants

Case No. 6:24-cv-00187-ADA-DTG

JURY TRIAL DEMANDED

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC., &
STRAUMANN USA, LLC,

Counterclaim-Plaintiffs,

v.

ALIGN TECHNOLOGY, INC.,

Counterclaim-Defendant.

STIPULATED JOINT MOTION TO AMEND THE CASE SCHEDULE

Plaintiff Align Technology, Inc. (“Align”), and Defendant Institut Straumann AG, Defendants and Counterclaim-Plaintiffs ClearCorrect Operating LLC, ClearCorrect Holdings, Inc., and Counterclaim-Plaintiff Straumann USA, LLC (collectively, “ClearCorrect”) respectfully move the Court to extend certain case deadlines as set forth below.

Under the Scheduling Order (Dkt. 132), the deadline for substantial completion of document production is March 17, 2025. On January 6, 2025, the Court entered a Stipulated Order Regarding Discovery of Electronically Stored Information (Dkt. 143), which outlines a process for

the parties to negotiate email and non-email custodial ESI discovery, *id.* ¶5. The parties have conferred and agreed that this case would benefit from additional time for the parties to complete such negotiations, to substantially complete production of documents, and corresponding adjustments to certain other case deadlines.

For these reasons, the parties respectfully request the Court grant this stipulated motion and extend certain case deadlines as set forth below.

Current Date	Proposed Date	Item
3/17/25	4/28/25	Substantial completion deadline for document production. ¹
4/17/25	5/22/25	Deadline to serve Final Infringement and Invalidity Contentions ² . After this date, leave of Court is required for any amendment to infringement contentions. This deadline does not relieve the parties of their obligation to seasonably amend if new information is identified after initial contentions.
5/15/25	6/16/25	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.)

¹ The parties commit to begin rolling productions in good faith and as soon as practicable.

² The parties may amend preliminary infringement contentions and preliminary invalidity contentions without leave of court so long as counsel certifies that it undertook reasonable efforts to prepare its preliminary contentions and the amendment is based on material identified after those preliminary contentions were served and should do so seasonably upon identifying any such material. Any amendment to add patent claims requires leave of court so that the Court can address any scheduling issues.

Dated: March 18, 2025

/s/ Rich S.J. Hung

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2025, a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF Electronic Filing System.

/s/ Rich S.J. Hung
Rich S.J. Hung

**IN THE UNITED STATES DISTRICT COURT
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Defendants.

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**[PROPOSED] ORDER GRANTING STIPULATED MOTION TO AMEND THE CASE
SCHEDULE**

Before the Court is the Parties' Stipulated Motion to Amend the Case Schedule. Having considered the Stipulated Motion, it is hereby GRANTED.

The deadlines in the Scheduling Order (Dkt. 132) are hereby modified as follows:

Current Date	New Date	Item
3/17/25	4/28/25	Substantial completion deadline for document production. ¹
4/17/25	5/22/25	Deadline to serve Final Infringement and Invalidity Contentions ² . After this date, leave of Court is required for any amendment to infringement contentions. This deadline does not relieve the parties of their obligation to seasonably amend if new information is identified after initial contentions.
5/15/25	6/16/25	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.)

SIGNED this _____ day of _____, 2025.

DEREK T. GILLILAND
UNITED STATES MAGISTRATE JUDGE

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