

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

BRECKENRIDGE PHARMACEUTICAL,
INC.,

Plaintiff,

v.

HETERO USA INC., HETERO LABS
LIMITED UNIT-III, HETERO LABS
LIMITED and CAMBER
PHARMACEUTICALS, INC.,

Defendants.

C.A. No. 24-571 (GBW)

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES

WHEREAS, the parties have conferred regarding a deadline for Defendants to advise if they will rely on an advice of counsel defense to willful infringement and produce any such opinions;

WHEREAS, the parties have agreed on an adjustment to the deadlines for fact and expert discovery, as well as the dispositive motion deadline;

WHEREAS, the briefing for the parties' dispositive motions will conclude more than four months prior to the date of the Pretrial Conference, which is September 24, 2026;

IT IS HEREBY STIPULATED AND AGREED, that, if Defendants intend to rely on an advice of counsel defense to willful infringement, they shall notify Plaintiffs and produce any opinion or advice being relied upon on or before September 12, 2025;

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, through their undersigned counsel, subject to the approval of the Court, that the Scheduling Order (D.I. 31, as modified by D.I. 75, 88) is amended as follows:

Event	Current Deadline	New Deadline
Close of Fact Discovery (<i>see</i> ¶ 4(a))	October 27, 2025	November 21, 2025
Opening Expert Reports (<i>see</i> ¶ 4(f))	November 25, 2025	December 22, 2025
Answering Expert Reports (<i>see</i> ¶ 4(f))	January 9, 2026	February 6, 2026
Reply Expert Reports (<i>see</i> ¶ 4(f))	February 6, 2026	February 27, 2026
Close of Expert Discovery (<i>see</i> ¶ 4(f))	March 6, 2026	March 30, 2026
Case Dispositive Motion Deadline (<i>see</i> ¶ 13(a))	April 6, 2026	May 6, 2026 ~~4~~

2 Briefing on Case Dispositive Motions and Discovery Motions shall be completed no later than May 31, 2026.

/s/ Sara M. Metzler

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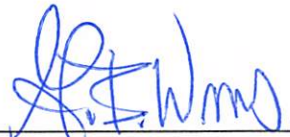
/s/ Kenneth L. Dorsney

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Labs Limited and
Camber Pharmaceuticals, Inc.*

Dated: June 27, 2025

IT IS SO ORDERED this 1st day of July, 2025



The Honorable Gregory B. Williams
United States District Judge