IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GENZYME CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 24-882 (RGA)
	)	
SAREPTA THERAPEUTICS, INC. and SAREPTA THERAPEUTICS THREE, LLC,	)	
	)	
Defendants.	)	

JOINT STIPULATION TO AMEND SCHEDULING ORDER

WHEREAS Plaintiff Genzyme Corporation ("Plaintiff" or "Genzyme") commenced this action on July 26, 2024 alleging that Defendants Sarepta Therapeutics, Inc.'s ("Sarepta Therapeutics"), and Sarepta Therapeutics Three, LLC's ("Sarepta Three") (together "Sarepta") manufacture and sale of Elevidys® infringes United States Patent Nos. 7,704,721 and 9,051,542 ("Original Asserted Patents");

WHEREAS on May 23, 2025, Plaintiff filed an Unopposed Motion for Leave to File Second Amended Complaint (D.I. 70);

WHEREAS on May 27, 2025, the Court granted Plaintiff's Unopposed Motion for Leave to File Second Amended Complaint (D.I. 73) and the Second Amended Complaint was filed (D.I. 74);

WHEREAS, in the filed Second Amended Complaint, Plaintiff brings new claims alleging infringement of five additional patents: United States Patent Nos. 12,031,894; 12,013,326; 11,698,377; 12,123,880; and 12,298,313 ("Additional Patents");

WHEREAS Sarepta did not oppose Plaintiff's filing the Second Amended Complaint contingent on submission of a joint stipulation requesting a revised case schedule allowing adequate time for disclosures and discovery concerning the five Additional Patents;

WHEREAS the parties respectfully request that the Court extend the current case schedule to allow adequate time with respect to the five Additional Patents;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the dates in the Scheduling Order (D.I. 31) shall be amended as follows:

Description of Event	**Current Date**	**Amended Date**
[Amended] Rule 26(a) Initial Disclosures	January 21, 2025	June 25, 2025
[Amended] Default Standard ¶ 3 Disclosures	February 14, 2025	July 16, 2025
Default Standard ¶ 4.a. Disclosures for Additional Patents (Plaintiff shall specifically identify the accused product(s) and the asserted patent(s) they allegedly infringe, and produce the file history for each asserted patent)	February 14, 2025	July 16, 2025
Default Standard ¶ 4.b. Disclosures for Additional Patents (Defendants to produce core technical documents for accused product(s))	March 17, 2025	August 13, 2025
Default Standard ¶ 4.c. Disclosures for Additional Patents (Plaintiffs to serve an initial claim chart relating each accused product to the asserted claims each product allegedly infringes)	April 16, 2025	September 15, 2025
Default Standard ¶ 4.d. Disclosures for Additional Patents (Defendants to produce Initial Invalidity Contentions for each asserted claim, as well as the related invalidating references)	May 16, 2025	October 15, 2025
Exchange of Claim Terms and Proposed Constructions	June 6, 2025	November 5, 2025
Joint Claim Construction Chart Filed	June 20, 2025	November 19, 2025
Plaintiff Serves Opening Claim Construction Brief	July 18, 2025	December 22, 2025
Joinder of other Parties and Amendment of Pleadings	August 1, 2025	August 1, 2025

Defendants Serve Answering Claim Construction Brief	August 15, 2025	January 26, 2026
Plaintiff Serves Reply Claim Construction Brief	September 5, 2025	February 16, 2026
Defendants Serve Sur-Reply Claim Construction Brief	September 26, 2025	March 9, 2026
Parties file Joint Claim Construction Brief	October 3, 2025	March 16, 2026
Document Production Substantially Complete	November 21, 2025	April 15, 2026
Hearing on Claim Construction	November 4, 2025 at 9 am	April 8, 2026, at 9:00 am
Fact Discovery Cut Off	February 20, 2026	June 30, 2026
Opening Disclosure of Expert Testimony	March 20, 2026	August 5, 2026
Rebuttal Disclosure of Expert Testimony	May 1, 2026	September 16, 2026
Any Reply Disclosure of Expert Testimony	May 29, 2026	October 14, 2026
Completion of Expert Discovery	July 17, 2026	December 4, 2026
Case Dispositive/Daubert Motions Filed	August 14, 2026	January 8, 2027
Case Dispositive/Daubert Responsive Briefs Filed	September 11, 2026	February 5, 2027
Case Dispositive/Daubert Reply Briefs Filed	October 2, 2026	March 5, 2027
Pretrial Conference	January 15, 2027 at 9 am	June 4, 2027, at 9:30 am
5-Day Jury Trial	January 25, 2027 at 9:30 am	June 14, 2027, at 9:30 am

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Dated: May 29, 2025

SO ORDERED this 29 day of May, 2025.

/s/ Richard G. Andrews
UNITED STATES DISTRICT JUDGE