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Counterclaim-Defendants WESTERN DIGITAL CORPORATION
11 and SANDISK TECHNOLOGIES, INC.

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SANDISK CORPORATION,

15 Plaintiff,

16 v.

17 IPVALUE MANAGEMENT, INC. and
18 LONGITUDE FLASH MEMORY
SOLUTIONS, LTD.,

19 Defendants.
20

21 AND RELATED COUNTERCLAIM.
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Case No. 5:25-CV-02389-PCP

**JOINT STIPULATION AND
PROPOSED ORDER TO MODIFY
CASE MANAGEMENT ORDER,
AS MODIFIED**

Date Filed: March 7, 2025

Trial Date:

Pursuant to Civil Local Rule 6-1(b), Plaintiff and Counter Defendant Sandisk Corporation and Counter Defendant Sandisk Technologies (“Sandisk”), and Defendants IPValue Management, Inc. and Longitude Flash Memory Solutions Ltd. (“Defendants”) (collectively, the “Parties”), submit this Stipulated Request and Proposed Order to Modify Case Management Order, which seeks to extend and consolidate deadlines so that all Asserted Patents proceed on the same schedule. The Parties hereby agree and jointly stipulate as follows:

1. Sandisk filed this action against IPValue on March 7, 2025, seeking a declaration that it does not infringe five patents: U.S. Patent No. 8,633,537 (“the ’537 patent”); U.S. Patent No. 9,929,240 (“the ’240 patent”); U.S. Patent No. 11,456,365 (“the ’365 patent”); U.S. Patent No. 6,963,505 (“the ’505 patent”); and U.S. Patent No. 7,671,664 (“the ’664 patent”) (collectively the “Asserted Patents”). ECF No. 1.

2. On June 5, 2025, the Court held the initial Case Management Conference. Pursuant to the Court’s June 5, 2025 Order, the Parties filed a Joint Notice regarding a proposed case schedule, which included deadlines through the trial-setting conference. ECF No. 34. On September 2, 2025, the Court entered the currently operative Case Management Order, which modified and adopted the dates proposed in the Joint Notice. ECF No. 48.

3. On July 16, 2025, IPValue filed a Counterclaim Complaint against Sandisk Corporation and Western Digital Corporation alleging infringement of the same five Asserted Patents in Sandisk’s declaratory judgment Complaint. ECF. No. 39.

4. On August 6, 2025, Sandisk and Western Digital moved to dismiss the Counterclaim regarding the ’505 patent. ECF No. 40. While the Motion to Dismiss remained pending, Sandisk filed a Motion to Stay Discovery and to Amend Case Schedule; and for Protective Order. ECF. No. 46. In response, the Court indicated that it would resolve the requests to stay discovery and amend the schedule pending resolution of the Motion to Dismiss, and referred to the Magistrate Judge the request to stay technical discovery and for a Protective Order.

5. On September 29, 2025, the Magistrate Judge entered a joint stipulation staying technical discovery as to the ’505 patent pending resolution of the Motion to Dismiss, while maintaining the infringement and invalidity contention deadlines for the remaining four Asserted

1 Patents. ECF No. 62

2 6. On October 7, 2025, the Court denied Sandisk's Motion to Dismiss. ECF. No. 65.
 3 On October 17, 2025, the Parties filed a joint stipulation and proposed order, which the Court
 4 entered on October 20, 2025, staying the case as to Western Digital and setting deadlines for
 5 IPValue to file an amended complaint adding Sandisk Technologies as a Party and for Sandisk to
 6 respond to the amended complaint.

7 7. On October 31, 2025, IPValue amended the complaint adding Sandisk
 8 Technologies as a Counterclaim Defendant. ECF No. 70. On November 14, 2025, Sandisk
 9 Corporation and Sandisk Technologies answered the Amended Complaint. ECF No. 74.

10 8. The operative Case Management Order (entered by the Court on September 2,
 11 2025) does not set any case deadlines for the '505 patent but instead states: "Disclosure of
 12 Asserted Claims and Infringement Contentions as to the U.S. Patent. No. 6,963,505, and
 13 Document Production Accompanying Disclosure" is "[t]o be ordered by the Court." ECF No. 48.
 14 The Court's order denying Sandisk's Motion to Dismiss also did not set any case deadlines for
 15 the '505 patent. ECF. No. 65.

16 9. IPValue served Infringement Contentions for the '505 patent on November 17,
 17 2025. The Parties then met and conferred regarding subsequent deadlines for the '505 patent, as
 18 well as the other upcoming case deadlines regarding damages contentions and claim construction
 19 that will involve the '505 patent. The Parties agreed, subject to the Court's approval, to a short
 20 extension to the current case deadlines so that all Asserted Patents can proceed on the same case
 21 schedule, and to accommodate Sandisk counsels' prearranged travel plans in December 2025.
 22 These requested continuances will promote judicial economy and conserve party resources by
 23 consolidating disclosures under the Patent Local Rules and the number of motions and hearings
 24 that will be required.

25 10. The Parties have filed five stipulations to set and/or extend deadlines but have not
 26 previously sought to amend any of the case deadlines set by the Case Management Order (ECF.
 27 No. 48). *See* ECF. No. 14 (Joint Stipulation to Extend Time to Respond to Complaint); ECF. No.
 28 30 (Stipulation to Modify Motion to Dismiss Opposition and Reply Deadlines); ECF. No. 33

Stipulation to Modify Motion to Dismiss Opposition and Reply Deadlines); ECF. No. 37 (Stipulation to Set Answer Deadline); ECF. No. 67 (Stipulation to add Sandisk Technologies as Party & Stay as to Western Digital Corporation and Setting Related Deadlines).

11. The Parties attest that these proposed deadlines will not affect any other deadlines set by the Court.

12. IT IS THEREFORE STIPULATED, by and between the Parties through their respective counsel, and subject to the approval of the Court, that the case schedule be modified as shown below:

	<u>Original Date</u>	<u>New Date</u>
Sandisk to serve invalidity contentions for the '505 patent	N/A	1/14/26
Claim construction – parties to identify claim construction terms	12/5/25	1/28/26
Claim construction – parties to exchange preliminary constructions	12/19/25	2/11/26
PLR 3-8. Damages Contentions	1/5/26	3/4/26
Joint Chart and Pre-hearing statement	1/15/26	3/11/26
PLR 3-9. Responsive Damages Contentions	2/4/26	4/3/26
Opening Brief	2/19/26	4/15/26
Responsive Brief	3/5/26	4/29/26
Reply Brief	3/12/26	5/7/26
Markman tutorial	3/31/26	5/21/26 5/19/26
Markman hearing	4/7/26	5/28/26 6/2/26
Deadline for the Parties to Participate in Private Mediation	5/7/26	No change
Substantial Completion of Document Production	5/7/26	No change
PLR 3-7 - Advice of Counsel	30 days after claim construction ruling	No change

Close of Fact Discovery	6/4/26	No change
Expert Opening Reports	7/15/26	No change
Expert Rebuttal Reports	8/26/26	No change
Close of Expert Discovery	9/18/26	No change
Filing of Dispositive/Daubert Motion(s)	10/13/26	No change
Trial Setting Conference	2/16/27	No change

Dated: December 3, 2025

KEKER, VAN NEST & PETERS LLP

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Dated: December 3, 2025

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 IPVALUE MANAGEMENT, INC. and
 LONGITUDE FLASH MEMORY
 SOLUTIONS LTD.

PURSUANT TO STIPULATION, IT IS SO ORDERED.Dated: December 5, 2025


 HONORABLE P. CASEY PITTS
 United States District Judge