Saiber
ATTORNEYS AT LAW

Katherine A. Escanlar
(973) 845-7720
kescanlar@saiber.com

October 27, 2025

BY CM/ECF

The Honorable José R. Almonte, U.S.M.J.
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: ***Happy Products, Inc. v. Ontel Products Corporation***
Case No. 2:24-cv-09819-EP-JRA

Dear Judge Almonte:

We, along with our co-counsel, ArentFox Schiff LLP, represent Defendant Ontel Products Corporation ("Defendant"), in the above-captioned matter. We submit this letter jointly with Plaintiff Happy Products, Inc. ("Plaintiff") to respectfully request a modest extension of the current case schedule (Dkt. No. 54) as it relates to the deadlines for *Markman* expert discovery and briefing.

Good cause supports the requested adjustment to the schedule because additional time is needed to evaluate and assess Plaintiff's Amended Infringement Contentions, which are due this Thursday, October 30 (Dkt. No. 92), before the parties finalize and file their respective opening *Markman* submissions due only two business days later on Monday, November 3. Thus, the parties met and conferred and have agreed upon the following amended schedule, subject to Your Honor's approval:

Event	Current Deadline (Dkt. No. 54)	New Deadline
The parties shall file and serve their opening *Markman* submissions pursuant to L. Pat. R. 4.5(a).	November 3, 2025	November 21, 2025

Event	Current Deadline (Dkt. No. 54)	New Deadline
The parties shall complete expert discovery pertaining to *Markman* issues pursuant to L. Pat. R. 4.5(b).	December 3, 2025	December 19, 2025
The parties shall file and serve their responding *Markman* submissions pursuant to L. Pat. R. 4.5(c).	December 30, 2025	January 16, 2026
The parties shall submit to the Court a proposed schedule for a *Markman* hearing pursuant to L. Pat. R. 4.6.	January 13, 2026	January 30, 2026

The parties do not believe any other case deadlines need to be extended as a result of this request.

Accordingly, if the proposed extension meets with the Court's approval, we respectfully request that Your Honor execute the below provision and direct the entry of this letter on the docket.

We thank the Court for its consideration and continued assistance in this matter. Naturally, if the Court has any questions, we would be pleased to respond to the same at the Court's direction.

Respectfully submitted,

s/ Katherine A. Escanlar
Katherine A. Escanlar

cc: Counsel of Record (by CM/ECF)

SO ORDERED this 28th day of October, 2025

Honorable José R. Almonte, U.S.M.J.