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Attorneys for Defendant
SAMSARA INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MOTIVE TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSARA INC.,

Defendant.

CASE NO. 24-CV-00902-JD

JOINT PROPOSED CASE SCHEDULE

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CASE NO. 24-cv-00902-JD

Pursuant to the Court's March 31, 2025 and April 23, 2025 orders (Dkts. 85, 88), Plaintiff Motive Technologies, Inc. ("Motive") and Defendant Samsara Inc. ("Samsara") propose the following case schedule (where the parties could not agree on a proposed date for a case event, each party provides its own proposal):

Case Event	Plaintiff's Proposed Date	Defendant's Proposed Date
Samsara's Answer and Counterclaims ¹	May 15, 2025	
Responses to Interrogatories and Requests for Production already served	May 27, 2025	
Rule 26(a)(1) Initial Disclosures	June 5, 2025	July 3, 2025
Revised Case Management Statement	June 5, 2025	July 3, 2025
Initial Case Management Conference	June 12, 2025 10:00 am	July 10, 2025 10:00 am
Motive's Amended Patent L.R. 3-1 and 3-2 Disclosures and Accompanying Document Production	May 29, 2025	July 24, 2025
Samsara's Patent L.R. 3-1 and 3-2 Disclosures and Accompanying Document Productions	May 29, 2025	July 24, 2025
Deadline to Amend the Pleadings/Add Parties	June 10, 2025 ²	
Patent L.R. 3-3 and 3-4 Invalidity Contentions	July 10, 2025	September 5, 2025
Patent L.R. 4-1 Exchange of Proposed Terms for Construction	July 24, 2025	September 19, 2025
Patent L.R. 4-2 Exchange of Preliminary Constructions and Extrinsic	August 14, 2025	October 10, 2025

¹ Samsara will file its Answer without prejudice to its pending motion to dismiss. Samsara intends to assert counterclaims for patent infringement against Motive.

² By agreeing to this date (proposed by Motive), Samsara does not waive its objections to any such amendment by Motive, including under Fed. R. Civ. P. 15.

Evidence		
Deadline to Request Leave to Designate more than Ten Terms for Claim Construction	August 25, 2025	October 21, 2025
Two Weeks before Joint Claim Construction Statement and Prehearing Statement per Claim Construction Standing Order R. 4		
Patent L.R. 3-8 Damages Contentions	August 29, 2025	October 24, 2025
Patent L.R. 4-3 Joint Claim Construction Statement and Prehearing Statement	September 8, 2025	November 4, 2025
Patent L.R. 3-9 Responsive Damages Contentions	September 26, 2025	November 21, 2025
Patent L.R. 4-4 Close of Claim Construction Discovery	October 8, 2025	December 4, 2025
Patent L.R. 4-5 (a) Opening Claim Construction Brief	October 23, 2025	December 19, 2025
Patent L.R. 4-5 (b) Responsive Claim Construction Brief	November 6, 2025	January 9, 2026
Written Technology Synopsis 7 days before Case Tutorial per Claim Construction Standing Order R. 8	November 17, 2025	January 22, 2026
Patent L.R. 4-5 (c) Reply Claim Construction Brief	November 13, 2025	January 16, 2026
Patent L.R. 3-10 Damages Contentions Meeting and Certification	November 25, 2025	January 20, 2026

Case Tutorial	November 24, 2025	January 29, 2026
One week prior to Claim Construction Hearing per Claim Construction Standing Order R. 8		
Claim Construction Hearing	December 4, 2025	February 5, 2026
Patent L.R. 3-7 Advice of Counsel Disclosure		TBD (30 days following service of the Court's Claim Construction Ruling)
Deadline to Substantially Complete Document Production	January 30, 2026	April 6, 2026
Non-Expert Discovery Cutoff	March 27, 2026	June 8, 2026
Deadline to File Non-Expert Discovery Motions	April 3, 2026	June 15, 2026
Expert Witness Disclosures (Burden)	May 1, 2026	July 15, 2026
Expert Witness Disclosures (Non-Burden)	June 5, 2026	August 17, 2026
Joint Trial Setting Conference Statement		TBD
7 days before Trial Setting Conference per Standing Order for Civil Cases R. 3		
Trial Setting Conference		TBD
Expert Discovery Cut-off	July 1, 2026	September 18, 2026
Deadline for Dispositive Motions and <i>Daubert</i> Motions	August 28, 2026	November 25, 2026
Deadline for Oppositions to Dispositive Motions and <i>Daubert</i> Motions	October 2, 2026	December 23, 2026
Deadline for Reply Briefs in Support of Dispositive Motions and <i>Daubert</i> Motions	November 6, 2026	January 13, 2027

Hearing on Dispositive Motions and <i>Daubert</i> Motions		TBD
Pretrial Filings Including Paired Sets of Motions <i>In Limine</i> Deadline		TBD
14 days before Final Pretrial Conference Per Standing Order for Civil Jury Trials R. 2		
Final Pretrial Conference		TBD
19 days before Trial per Standing Order for Civil Jury Trials R. 1		
Joint Filing of Deposition Testimony and Other Discovery Offered at Trial		TBD
5 days before Trial per Standing Order for Civil Jury Trials R. 32		
Trial	Mid February 2027	Late April 2027
No more than 18 months from Initial Case Management Conference Per Standing Order for Civil Cases		

DATED: April 25, 2025

Respectfully submitted,

/s/ David S. Bloch

/s/ Ali-Reza Boloori

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Ali-Reza Boloori, hereby attest, pursuant to N.D. Cal. Civil Local Rule 5-1(i)(3), that the concurrence to the filing of this document has been obtained from David S. Bloch, signatory hereto.

Dated: April 25, 2025

By: /s/ Ali-Reza Boloori
Ali-Reza Boloori