UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MOSKOWITZ FAMILY LLC, Plaintiff, v. MEDTRONIC, INC., MEDTRONIC SOFAMOR DANEK, INC., MEDTRONIC SOFAMOR DANEK USA, INC., WARSAW ORTHOPEDIC, INC., and TITAN SPINE, INC., Defendants.	CASE NO. 25-cv-00769-PJS-DLM **JURY TRIAL DEMANDED**

STIPULATION TO AMEND CASE SCHEDULE CONCERNING
CONTENTIONS AND CLAIM CONSTRUCTION

Plaintiff Moskowitz Family LLC and Defendants Medtronic, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek USA, Inc., Warsaw Orthopedic, Inc., and Titan Spine, Inc. (collectively "Defendants"), through their undersigned counsel, stipulate and agree, subject to the Court's approval, to extend certain deadlines for exchange of contentions and claim construction set forth in the Pretrial Scheduling Order (ECF No. 36). The parties submit that good cause exists to modify these deadlines in view of Plaintiff's forthcoming Unopposed Motion to Amend the Complaint to assert a newly-issued patent, which Plaintiff anticipates filing in the near future. No other deadlines are altered by this stipulation, and fact discovery in this case closes on April 9, 2027.

The parties jointly request that the Court modify the Pretrial Scheduling Order (ECF No. 36) as follows:

Event	Current Deadline	New Deadline
Infringement Claim Charts	October 30, 2025	January 30, 2026[1]
Responsive Claim Charts	January 28, 2026	April 28, 2026
Prior Art Chart and Invalidity Statement	January 28, 2026	April 28, 2026
Plaintiff's Response to Prior Art and Invalidity Chart	within 90 days of receipt of Defendants' Prior Art Chart and Invalidity Statement (April 28, 2026)	within 90 days of receipt of Defendants' Prior Art Chart and Invalidity Statement (July 27, 2026)
Claim Construction Exchange of Terms	May 7, 2026	August 7, 2026
Claim Construction Exchange of Proposed Definitions	May 21, 2026	August 21, 2026
Claim Construction Meet and Confer	By May 29, 2026	By August 28, 2026
Request for Claim Construction Hearing	By June 1, 2026	By September 1, 2026
Joint Claim Construction Statement	June 11, 2026	September 11, 2026
Claim Construction Hearing Date	Before July 14, 2026	Before October 13, 2026

[1] Plaintiff's Infringement Claim Charts will assert no more than 150 total claims from all asserted patents, including the newly-issued patent, and will include any contentions regarding indirect infringement.

Dated: January 16, 2026

By: *s/Jason M. Zucchi*

William R. Woodford (Bar No.0322593)
Todd S. Werner (Bar No.033019X)
Jason M. Zucchi (Bar No. 0387908)
Shelleaha L. Jonas (Bar No. 0398417)
AVANTECH LAW, LLP
80 South 8th Street, Suite 900
Minneapolis, MN 55402
woodford@avantechlaw.com
werner@avantechlaw.com
zucchi@avantechlaw.com
jonas@avantechlaw.com
Phone: (612) 895-2721

Julianne Thomsen (Admitted *pro hac vice*)
521 5th Avenue, 17th Floor
New York, NY 10175-0038
thomsen@avantechlaw.com
Phone: (646) 516-5248
Fax: (612) 464-2001

Attorneys for Plaintiff
Moskowitz Family LLC

Dated: January 16, 2026

By: *s/X. Kevin Zhao*

GREENE ESPEL PLLP

Sybil L. Dunlop, Reg. No. 0390186
X. Kevin Zhao, Reg. No. 0391302
Kshithij Shrinath, Reg. No. 0505164
222 S. Ninth Street, Suite 2200
Minneapolis, MN 55402
sdunlop@greeneespel.com
kzhao@greeneespel.com
kshrinath@greeneespel.com
(612) 373-0830

HUESTON HENNIGAN LLP

Moez M. Kaba (*pro hac vice*)
Christina Von der Ahe Rayburn (*pro hac vice*)
Christine Woodin (*pro hac vice*)
523 West 6th Street, Suite 400

Los Angeles, CA 90014
mkaba@hueston.com
crayburn@hueston.com
cwoodin@hueston.com
(213) 788-4340

Attorneys for Defendants Medtronic, Inc.; Medtronic Sofamor Danek, Inc.; Medtronic Sofamor Danek USA, Inc.; Warsaw Orthopedic, Inc.; and Titan Spine, Inc.