EXHIBIT A

EXHIBIT A

PROPOSED CASE MANAGEMENT SCHEDULE

Event	Proposed Date/Deadline
Initial Disclosures of Both Parties (with no patent infringement counter-claim) / Commencement of Fact Discovery (LPR 2.1, LPR 1.3)	5/9/25
Initial Infringement Contentions (LPR 2.2)	6/6/25
Initial Non-Infringement, Unenforceability and Invalidity Contentions (LPR 2.3)	7/11/25
Initial Response To Invalidity Contentions (LPR 2.5)	8/8/25
Final Infringement, Unenforceability and Invalidity Contentions (LPR 3.1)	10/31/25
Deadline for Plaintiff to Amend Pleadings or Join Parties (without good cause)	11/7/25
Final Non-infringement, Enforceability and Validity Contentions (LPR 3.2)	12/5/25
Deadline for Defendant to Amend Pleadings or Join Parties (without good cause)	12/12/25
Exchange of Claim Terms Needing Construction and Proposed Construction (LPR 4.1)	12/19/25
Opening Claim Construction Brief (LPR 4.2(a))	1/30/26
Responsive Claim Construction Brief (LPR 4.2(c))	2/27/26
Reply Claim Construction Brief (LPR 4.2(d))	3/13/26
Joint Claim Construction Chart (LPR 4.2(f))	3/20/26
Claim Construction Hearing (LPR 4.3)	4/17/26 or at the Court's convenience

Event	**Proposed Date/Deadline**
Close of Fact Discovery (LPR 1.3)	7/3/26 or 42 days after the claim construction ruling, whichever is later
Expert Reports of Parties with Burden of Proof (LPR 5.1(b))	7/31/26 or 28 days after the close of fact discovery, whichever is later
Rebuttal Expert Reports (LPR 5.1)	9/4/26 or 35 days after service of initial expert reports, whichever is later
Completion of Expert Witness Depositions (LPR 5.2)	10/9/26 or 35 days after service of rebuttal expert reports, whichever is later
Final Day for Filing Dispositive Motions (LPR 6.1)	11/6/26 or 28 days after the close of expert discovery, whichever is later
Case Ready for Trial	3/26/27 or 20 weeks after the filing of dispositive motions, whichever is later