IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MILWAUKEE ELECTRIC TOOL CORPORATION, Plaintiff, v. KLEIN TOOLS, INC., Defendant.	Case No. 1:25-cv-04689

JOINT AGREED MOTION TO EXTEND CERTAIN DEADLINES OF THE SCHEDULING ORDER

Plaintiff Milwaukee Electric Tool Corporation ("Plaintiff" or "Milwaukee") and Defendant Klein Tools, Inc. ("Defendant" or "Klein") (collectively, the "Parties") respectfully submit this Joint Agreed Motion to Extend Certain Deadlines set forth in the Court's scheduling order (Dkt. 42; Dkt. 30).

This Joint Agreed Motion is based on the following:

1. This is the Parties' second request for an extension of deadlines relating to final contentions and the exchange of claim terms. The Court previously granted the Parties' request for extension of these deadlines. *See* Dkt. 42. This is the Parties' first request for an extension of the remaining deadlines outlined below.

2. Milwaukee served its Final Infringement Contentions (Stage 1) on January 7, 2026. The exchange of Final Infringement, Unenforceability, and Invalidity Contentions (Stage 2) is set to occur on January 21, 2026. The Parties agree that additional time is necessary to conduct discovery ahead of the exchange of final contentions and submission of claim construction briefing. Specifically, both parties believe that email discovery is appropriate in this case and have

been negotiating a proposed ESI Order to govern email discovery, which was filed on January 12, 2026, and entered on January 13, 2026 (Dkt. 52). Additionally, the parties agree that it would be more efficient to conduct depositions after email discovery. The requested extensions are therefore sought in good faith and with the goal of affording each Party sufficient time to conduct this discovery and prepare its contentions.

3. Counsel for both Parties have conferred, and no Party objects to the requested extensions.

4. The requested extensions would not have any material effect on the other deadlines in the schedule.

5. The Parties do not seek any extension for events or deadlines not expressly outlined herein.

WHEREFORE, the Parties stipulate and agree, subject to the Court's approval, that the following dates in the schedule be modified as follows:

Event	Initial Deadline	Current Deadline	Proposed Deadline
Final Infringement, Unenforceability, and Invalidity Contentions (Stage 2)	December 19, 2025	January 21, 2026	April 24, 2026
Final Non-Infringement, Validity, and Enforceability Contentions	January 16, 2026	February 11, 2026	May 15, 2026
Exchange of Claims Terms for Construction	January 30, 2026	February 6, 2026	May 29, 2026
Meet and Confer Regarding Selection of Claim Terms	February 6, 2026	February 16, 2026	June 5, 2026
Opening Claim Construction Brief + Joint Appendix	March 6, 2026		July 10, 2026
Responsive Claim Construction Brief	April 3, 2026		Aug. 7, 2026
Reply Claim Construction Brief	April 17, 2026		Aug. 21, 2026
Joint Claim Construction Chart	April 24, 2026		Aug. 28, 2026
Exchange of Claim Construction Exhibits	May 12, 2026		Sept. 15, 2026

Event	Initial Deadline	Current Deadline	Proposed Deadline
Claim Construction Hearing (Markman)	May 15, 2026		Sept. 18, 2026

IT IS SO AGREED.

Dated: January 20, 2026

Respectfully submitted,

/s/ Jason C. White

Jason C. White
Scott D. Sherwin
Karon N. Fowler
MORGAN, LEWIS & BOCKIUS LLP
110 N. Wacker Drive, Suite 2800
Chicago, IL 60601-5094
Telephone: 312.324.1000
Fax: 312.324.1001
jason.white@morganlewis.com
scott.sherwin@morganlewis.com
karon.fowler@morganlewis.com

Michael Barboun (to be admitted *pro hac vice*)
MORGAN, LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103-3007
Telephone: 215.963.5000
Fax: 215.963.5001
michael.barboun@morganlewis.com

Attorneys for Plaintiff Milwaukee Electric Tool Corporation

/s/ Nathaniel L. DeLucia

Brian A. Verbus
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza
Chicago, IL 60654
Telephone: (312) 862-2000
Fax: (312) 862-2200
brian.verbus@kirkland.com

Gregory S. Arovas
Ryan Kane, P.C. (*pro hac vice*)
Nathaniel L. DeLucia (*pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Fax: (212) 446-4900
garovas@kirkland.com
ryan.kane@kirkland.com
nathanial.delucia@kirkland.com

Attorneys for Defendant Klein Tools, Inc.