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*

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