UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF GEORGIA

AUGUSTA DIVISION

Solbello, Inc.	)	
	)	
Plaintiff	)	
	)	
v.	)	Case No. 1:25-cv-00267-JRH-BKE
ShoreShade LLC	)	
	)	
	)	
Defendant	)	

RULE 26(f) REPORT

1. Date of Rule 26(f) conference: 1/20/2026 and 2/2/2026
2. Parties or counsel who participated in conference:
   Craig Killen, Joseph Schouten, Payton Bullard
3. If any defendant has yet to be served, please identify the defendant and state when service is expected.
   N/A
4. Date the Rule 26(a)(1) disclosures were made or will be made:
   14 days from ruling 12(b) Motion
5. If any party objects to making the initial disclosures required by Rule 26(a)(1) or proposes changes to the timing or form of those disclosures,
   (a) Identify the party or parties making the objection or proposal:

   N/A

   (b) Specify the objection or proposal:

   N/A

6. The Local Rules provide a 140-day period for discovery. If any party is requesting additional time for discovery,

(a) Identify the party or parties requesting additional time:

All parties request additional time for discovery in order to allow the claim construction process to take place.

(b) State the number of months the parties are requesting for discovery:

~9 months

(c) Identify the reason(s) for requesting additional time for discovery:

_____ Unusually large number of parties

_____ Unusually large number of claims or defenses

_____ Unusually large number of witnesses

_____ Exceptionally complex factual issues

_____ Need for discovery outside the United States

X Other: Need for claim construction on patent infringement claim

(d) Please provide a brief statement in support of each of the reasons identified above:

Generally patent infringement cases proceed with claim construction before the parties can engage in additional discovery in order to allow the parties to effectively target their discovery efforts to the actual issues that remain in the case.

7. If any party is requesting that discovery be limited to particular issues or conducted in phases, please

(a) Identify the party or parties requesting such limits:

The parties have conferred and jointly propose the Appendix and its limits.

(b) State the nature of any proposed limits:

The parties propose that fact discovery on damages occur after the claim construction hearing. However, all other fact discovery will be permitted to run in tandem with the claim construction process.

8. The Local Rules provide, and the Court generally imposes, the following deadlines:

Last day for filing motions to add or join parties or amend pleadings	60 days after issue is joined
Last day to furnish expert witness report by plaintiff	60 days after Rule26(f) conference
Last day to furnish expert witness report by a defendant	90 days after Rule 26(f) conference (or 60 days after the answer, whichever is later)

Last day to file motions	30 days after close of discovery

If any party requests a modification of any of these deadlines,

(a) Identify the party or parties requesting the modification:

All parties

(b) State which deadline should be modified and the reason supporting the request:

Based on a need for claim construction, the parties request the deadline set forth in the attached proposed joint appendix.

9. If the case involves electronic discovery,

(a) State whether the parties have reached an agreement regarding the preservation, disclosure, or discovery of electronically stored information, and if the parties prefer to have their agreement memoralized in the scheduling order, briefly describe the terms of their agreement:

The parties anticipate that discovery will include electronically stored information and are working together to prepare an ESI Protocol.

(b) Identify any issues regarding electronically stored information as to which the parties have been unable to reach an agreement:

N/A

10. If the case is known to involve claims of privilege or protection of trial preparation material,

    (a) State whether the parties have reached an agreement regarding the procedures for asserting claims of privilege or protection after production of either electronic or other discovery material:

    The parties anticipate that discovery will require exchange of confidential information, and they are working together to prepare a protective order.

    (b) Briefly describe the terms of any agreement the parties wish to have memoralized in the scheduling order (or attach any separate proposed order which the parties are requesting the Court to enter addressing such matters):

    The parties expect to submit their proposed protective order in a separate filing.

    (c) Identify any issues regarding claims of privilege or protection as to which the parties have been unable to reach an agreement:

    None at this time.

11. State any other matters the Court should include in its scheduling order:

    Please see attached Appendix with patent case deadlines

12. The parties certify by their signatures below that they have discussed the nature and basis of their claims and defenses and

the possibilities for prompt settlement or resolution of the case. Please state any specific problems that have created a hindrance to the settlement of the case:

_____

_____

_____

This 17th day of February, 2026

Signed: s/ Christopher A. Cosper
Attorney for Plaintiff

s/ Craig Killen
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

Solbello, Inc.,	)	
Plaintiff	)	
	)	CIVIL ACTION FILE NO.:
v.	)	1:25-cv-00267-JRH-BKE
	)	
ShoreShade LLC,	)	
Defendant	)	

APPENDIX TO JOINT RULE 26(f) REPORT
PATENT CASE DEADLINES

Pursuant to Local Rule 26.1, the parties have conferred and submit the following proposed timeline for all deadlines in this matter. To the extent there are deviations in this proposed timeline from the Local Rules, those deviations are based on the need for claim construction to occur before the case moves forward.

1. Parties serve Rule 26(a)(1) Initial Disclosures – **14 days from the Court's ruling on Motion to Dismiss**

2. Plaintiff serves Disclosure of Asserted Claims and Preliminary Infringement Contentions (as defined in LR 3-1 of the Local Rules in the U.S. District Court for the Northern District of California) – **21 days from the Court's ruling on Motion to Dismiss**

3. Defendant's Disclosure of Invalidity Contentions (as defined in LR 3-3 of the Local Rules in N.D. Cal.) – **45 days from service of the Disclosure of Asserted Claims and Preliminary Infringement Contentions**

4. Plaintiff and Defendant simultaneously exchange terms and claim elements for construction (as defined in LR 4-1 of the Local Rules in N.D. Cal.) – **14 days after service of Preliminary Invalidity Contentions are served by Defendant**

5. Exchange of Preliminary Claim Constructions and Extrinsic Evidence (as defined in LR 4-2 of the Local Rules in N.D. Cal.) – **21 days after service of Proposed Terms for Claim Construction are served**

6. Deadline to file the Joint Claim Construction and Prehearing Statement (as defined in LR 4-3 of the Local Rules in N.D. Cal.) – **60 days after service of Invalidity Contentions**

7. Deadline for all parties to file and serve claim construction expert reports (as detailed in LR 4-3 of the Local Rules in N.D. Cal.) – **60 days after service of Invalidity Contentions**

8. Deadline to Complete Claim Construction Discovery (as defined in LR 4-4 of the Local Rules in N.D. Cal.) – **30 days from filing of Joint Claim Construction and Prehearing Statement**

9. Deadline to serve Opening Claim Construction Briefs (as defined in LR 4-5 of the Local Rules in N.D. Cal.) – **45 days from filing Joint Claim Construction and Prehearing Statement**

10. Deadline to serve Responsive Briefs (as defined in LR 4-5 of the Local Rules in N.D. Cal.) – **14 days from service of Opening Claim Construction Briefs**

11. Deadline for Plaintiff to file Reply Claim Construction Brief (as defined in LR 4-5 of the Local Rules in N.D. Cal.) – **7 days from service of Defendant's Responsive Brief**

12. Claim Construction Hearing to be scheduled at the Court's discretion.

13. Fact Discovery – With the exception of fact discovery on damages, fact discovery shall begin to run on the same date that claim construction discovery begins to run. Fact discovery on damages may begin on the first business day after the Claim Construction Hearing.

14. Rule 26(e) Supplementations Due – **15 days after entry of Claim Construction Order**

15. Disclosure of reliance on advice of counsel (as defined in LR 3-7 of the Local Rules in N.D. Cal.) – **30 days after service of Claim Construction Order**

16. Close of Fact Discovery – **90 days after entry of Claim Construction Order**

17. Parties to serve Initial Expert Witness Disclosures (including reports) on issues on which they bear the burden of proof (other than those addressed during claim construction) – **30 days after Close of Fact Discovery**

18. Parties to serve Expert Witness Disclosures (including reports) on issues on which the opposing party bears the burden of proof – **60 days after Close of Fact Discovery**

19. Deadline to serve Rebuttal Expert Witness Reports – **75 days after Close of Fact Discovery**

20. Expert Depositions Commence – **90 days after Close of Fact Discovery**

21. Close of Expert Depositions – **120 days after Close of Fact Discovery**

22. Close of Expert Discovery – **120 days after Close of Fact Discovery**

23. Deadline for Filing Dispositive Motions and *Daubert* Motions – **30 days after Close of Expert Discovery**

Issues Specific to Patent Cases

The results of the parties' discussions concerning some issues common in patent cases:

1. The parties agree that claim construction will be necessary in this case. Therefore, the parties have proposed dates above for claim construction exchanges consistent with the Local Patent Rules for the Northern District of California and have further proposed a claim construction hearing at this Court's discretion.

2. At this time, the parties do not request a claim construction prehearing conference. The parties intend to revisit this issue upon completion of claim

construction briefing and will inform the Court promptly in the event of any change in their current view.

3. The parties do not anticipate the need for a special master in this case.

4. The parties do not believe that a hearing regarding an overview of the technology at issue will be necessary beyond any such presentation at a claim-construction hearing. If the Court desires, the parties can present a brief technology tutorial at a time convenient for the Court.

5. The parties are not presently aware of any other patent-related issues foreseeable in this case.