

1 MARILYN H. RIDDERVOLD (SBN 263219)
 2 2500 Dean Leshner Drive, Suite A
 3 Concord, CA 94520
 4 Telephone: (925) 689-1200
 5 Facsimile: (925) 689-1263
 6 Email: mriddevold@wordtechsystems.com

7 Attorney for Plaintiff and Counterdefendant,
 8 WORDTECH SYSTEMS INC.

9 RICHARD ESTY PETERSON (SBN 41013)
 10 Patent Attorney
 11 537 Valley Street
 12 San Francisco, CA 94131
 13 Telephone: (415) 826-3921
 14 Email: sfreptile@mac.com

15 Attorney for Plaintiff and Counterdefendant,
 16 QUINTAL RESEARCH GROUP, INC.

KILPATRICK TOWNSEND & STOCKTON LLP
 ROBERT J. ARTUZ (SBN 227789)
 G. ROSS ALLEN (SBN 262968)

1080 Marsh Road
 Menlo Park, CA 94025
 Telephone: (650) 326-2400

Facsimile: (650) 326-2422
 Email: rartuz@kilpatricktownsend.com
 grallen@kilpatricktownsend.com

Attorneys for Defendant and Counterclaimant
 LEAPFROG ENTERPRISES, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

15 WORDTECH SYSTEMS INC. and QUINTAL
 16 RESEARCH GROUP, INC.,
 17 Plaintiffs,
 18 v.
 19 LEAPFROG ENTERPRISES, INC., a Delaware
 20 corporation doing business in California and Does
 21 1-50,
 22 Defendant.

23 AND RELATED COUNTERCLAIMS

Case No.: 11-cv-3771-WHA

~~PROPOSED~~ ORDER RE: SCHEDULE
 FOR CLAIM CONSTRUCTION

JUDGE: HON. WILLIAM ALSUP
 ACTION FILED: AUGUST 1, 2011
 TRIAL DATE: NONE

25 Pursuant to the Court’s Case Management Order And Reference To Magistrate Judge For
 26 Mediation/Settlement (Dckt No. 34), plaintiffs Wordtech System, Inc. and Quintal Research Group,
 27 Inc., and defendant Leapfrog Enterprises, Inc. propose the following claim construction schedule.

	Event/Filing	Date	Rule
1			
2	Last day for Defendant to serve its preliminary invalidity contentions and produce documents	May 1, 2012	Established by the Court Patent L.R. 3-3; 3-4
3			
4	Last day for parties to exchange proposed terms and claim elements for construction	May 15, 2012	Patent L.R. 4-1
5			
6	Last day for parties to exchange preliminary claim constructions and extrinsic evidence	June 5, 2012	Patent L.R. 4-2
7			
8	Last day for parties to file Joint Claim Construction And Prehearing Statement	June 27, 2012	Patent L.R. 4-3
9			
10	Last day to complete claim construction discovery	July 27, 2012	Patent L.R. 4-4
11	The parties to simultaneously serve claim construction briefs	August 10, 2012	Patent L.R. 4-5(a); Agreement by the parties
12	The parties to simultaneously serve responsive claim construction briefs	August 24, 2012	Patent L.R. 4-5(b); Agreement by the parties
13	No reply briefs except with leave of the Court.		Patent L.R. 4-5(c); Agreement by the parties
14	Claim Construction Tutorial	September 12, 2012	Established by the Court
15	Claim Construction Hearing	September 26, 2012	Established by the Court

RESPECTFULLY SUBMITTED BY:

DATE: February 29, 2012

/s/ Marilyn H. Riddervold
Marilyn H. Riddervold
Attorney for Plaintiff,
WORDTECH SYSTEMS, INC.

DATE: February 29, 2012

/s/ Richard Esty Peterson
Richard Esty Peterson
Attorney for Plaintiffs,
QUINTAL RESEARCH GROUP, INC.

DATE: February 29, 2012

/s/ Robert J. Artuz
Robert J. Artuz
Attorney for Defendant,
LEAPFROG ENTERPRISES, INC.

General Order 45 Attestation of Signatures

I, Marilyn H. Riddervold, as the ECF user and filer of this document attest that the concurrence in the filing of this document has been obtained from the other signatories, which shall serve in lieu of their signatures.

/s/ Marilyn H. Riddervold
Marilyn H. Riddervold
Attorney for Plaintiff,
WORDTECH SYSTEMS, INC.

IT IS SO ORDERED.

Dated: March 2, 2012.



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