

Robert A. Mittelstaedt (SBN 60359)  
 ramittelstaedt@jonesday.com  
 Patrick T. Michael (SBN 169745)  
 pmichael@jonesday.com  
 Krista S. Schwartz (Admitted *Pro Hac Vice*)  
 ksschwartz@jonesday.com  
 Joe C. Liu (SBN 237356)  
 jcliu@jonesday.com  
 JONES DAY  
 555 California Street, 26th Floor  
 San Francisco, CA 94104  
 Telephone: (415) 626-3939  
 Facsimile: (415) 875-5700  
 Attorneys for Plaintiff  
 SYNOPSIS, INC.

Paul Alexander (#49997)  
 ARNOLD & PORTER LLP  
 1801 Page Mill Road, Suite 110  
 Palo Alto, CA 94304-1216  
 Telephone: (650) 798-2920  
 Fax: (650) 798-2999  
 E-Mail: paul.alexander@aporter.com

Martin R. Glick (#40187)  
 Daniel B. Asimow (#165661)  
 Willow White Noonan (#277584)  
 ARNOLD & PORTER LLP  
 Three Embarcadero Center, 7<sup>th</sup> Floor  
 San Francisco, CA 94111-4024  
 Telephone: (415) 471-3100  
 Fax: (415) 471-3400  
 E-Mail: Marty.Glick@aporter.com  
 E-Mail: Daniel.Asimow@aporter.com  
 E-Mail: Willow.Noonan@aporter.com

Denise McKenzie (#193313)  
 Ryan Nishimoto (#235208)  
 ARNOLD & PORTER LLP  
 777 South Figueroa Street  
 Forty-Fourth Floor  
 Los Angeles, CA 90017-5844  
 Telephone: (213) 243-4000  
 Fax: (213) 243-4199  
 E-Mail: Denise.McKenzie@aporter.com  
 E-Mail: Ryan.Nishimoto@aporter.com

Attorneys for Defendant  
 ATOPTECH, INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

SYNOPSIS, INC.,

Plaintiff,

v.

ATOPTECH, INC.,

Defendant.

**Case No. 3:13-cv-02965-MMC (DMR)**

**[JOINT PROPOSED] ORDER  
 REGARDING DEADLINES AND  
 DISCOVERY LIMITS FOR  
 SYNOPSIS' PATENT CLAIMS  
 (COUNTS II-V)**

Pursuant to the Court's Order to submit a joint proposed order regarding patent deadlines (ECF No. 267) and the parties agreement to propose additional discovery limits relating to Synopsys' patent claims when the stay of Synopsys' patent claims is lifted (ECF No. 172), the parties jointly submit the following proposed deadlines and discovery limits relating to Synopsys' patent claims (Counts II–V).

**I. Proposed Schedule for Synopsys' Patent Claims:**

DEADLINE	EVENT
May 4, 2015	Filing of any amendment to Answer to Synopsys' patent claims.
May 15, 2015	Disclosure of Asserted Claims and Infringement Contentions, and Production of Related Documents (PLR 3-1, 3-2)
Jun 30, 2015	Disclosure of Invalidity Contentions and Production of Related Documents (PLR 3-3, 3-4)
Jul 14, 2015	Exchange Proposed Terms and Claim Elements for Construction (PLR 4-1(a))
Aug 4, 2015	Exchange Preliminary Claim Constructions, Intrinsic and Extrinsic Evidence (PLR 4-2)
Aug 31, 2015	Joint Claim Construction and Prehearing Statement (PLR 4-3)
Sep 30, 2015	Completion of Claim Construction Discovery (PLR 4-4)
Oct 15, 2015	Opening Claim Construction Brief (PLR 4-5(a))
Oct 29, 2015	Responsive Claim Construction Brief (PLR 4-5(b))
Nov 5, 2015	Reply Claim Construction Brief (PLR 4-5(c))
Dec 7, 2015	Claim Construction Hearing (PLR 4-6)
Jan 19, 2016	Ruling on Claim Construction ( <i>Estimated</i> )
July 15, 2016	Close of Fact Discovery

DEADLINE	EVENT
Aug 15, 2016	Opening Expert Reports
Sep 15, 2016	Rebuttal Expert Reports
Oct 15, 2016	Expert Discovery Cutoff
Dec 15, 2016	Motions for Summary Judgment Deadline
Feb 15, 2017	Pre-Trial Conference
Mar 1, 2017	Trial

## **II. Proposed Discovery Limits for Synopsys' Patent Claims:**

DISCOVERY	LIMITS
Interrogatories	25
Fact Witness Depositions (including 30(b)(6) depositions)	80 hours – with a maximum of 15 witnesses
Expert Witness Depositions – Infringement and Invalidity Issues	7 hours for each expert report submitted for up to 2 patents; and 3 additional hours for each additional patent addressed in each expert report.
Expert Witness Depositions – Damages Issues	7 hours for each expert report submitted.

Dated: April 24, 2015

Respectfully submitted,

JONES DAY

By: /s/ Patrick T. Michael  
Patrick T. Michael

Attorneys for Plaintiff  
SYNOPSYS, INC.

ARNOLD & PORTER

By: /s/ Paul Alexander  
Paul Alexander


Attorneys for Defendant  
ATOPTECH, INC.

**~~JOINT PROPOSED~~ ORDER REGARDING DEADLINES AND DISCOVERY  
LIMITS RELATING TO SYNOPSYS' PATENT CLAIMS**

The above joint proposed deadlines and discovery limits relating to Synopsys' patent claims (Counts II–V) is approved ~~and all parties shall comply with its provisions.~~ with one exception: the pretrial conference shall be held on Tuesday, February 14, 2017, at 10:00 a.m.

**IT SO ORDERED.**

Dated: April 27, 2015

By:   
Hon. Maxine Chesney  
United States District Judge