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(Additional counsel on signature page)

Attorneys for Plaintiffs

Attorneys for Defendant Apple Inc.

REMBRANDT PATENT INNOVATIONS, LLC and
REMBRANDT SECURE COMPUTING, LP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**REMBRANDT PATENT INNOVATIONS,
LLC and REMBRANDT SECURE
COMPUTING, LP,**

Plaintiffs,

v.

APPLE INC.

Defendants.

NO. 3:14-cv-05094-WHA (Lead)
NO. 3:14-cv-05093-WHA (Consolidated)

**JOINT STIPULATION FOR
PRETRIAL SCHEDULE AND
~~PROPOSED~~ ORDER**

Judge: Honorable William H. Alsup
Courtroom: 8, 19th Floor

Pursuant to Docket Entry 185, Plaintiffs Rembrandt Patent Innovations LLC and Rembrandt Secure Computing, LP (collectively “Rembrandt”) and Defendant Apple Inc. (“Apple”) hereby submit this Joint Stipulation for a Pretrial Schedule and Proposed Order. The chart below details the parties’ proposed schedule up and until the pretrial conference on June 22, 2016.

Proposed Pretrial Schedule

| Date | Event |
|---|--|
| Friday June 3, 2016, by 11:59 PM PDT: | Parties serve FRCP 26(a)(3) disclosures on each other, including: <ul style="list-style-type: none"> - A list of will- and may- call witnesses, including identification of witnesses to appear by deposition - Exhibit list in Excel (including description of exhibit, beginning and end bates numbers, column for when it is offered in evidence, column for limitations on use, column to specify source) |
| Tuesday June 7, 2016, by 11:59 PM PDT | Parties to serve Opening Motions in Limine on each other |
| Tuesday June 14, 2016, by 3:00 pm PDT: | Parties to serve Oppositions to Motions in Limine on each other |
| Wednesday, June 15, 2016, by 11:59 pm PDT: | Rembrandt to file JOINT PROPOSED PRETRIAL ORDER and provide Court with soft and hard copies. Includes: <ul style="list-style-type: none"> - Joint proposed final pretrial order - Joint proposed undisputed instructions on substantive issues of law - Memoranda of law in support of each party’s disputed instructions - Joint special verdict form - Joint set of proposed voir dire + separate requests - Motions in Limine and Opposition packets - Copies of Rule 26(a)(3) disclosures |
| Friday June 17, 2016, by 11:59 pm PDT | Each party to serve objections to other side’s exhibit list |

1 Dated: May 31, 2016

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ATTESTATION

I, Jacob A. Schroeder, the filer attest that concurrence from Apple's outside counsel in the filing of the document has been obtained.

By: /s/ Jacob A. Schroeder
Jacob A. Schroeder
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Secure Computing, LP

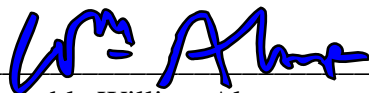
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~~PROPOSED~~ ORDER

The above JOINT STIPULATION FOR PRETRIAL SCHEDULE AND [PROPOSED] ORDER is hereby GRANTED and the schedule proposed by the parties is hereby adopted.

IT IS SO ORDERED.

Dated: June 1, 2016.



Honorable William Alsup
United States District Judge