Doc. 92

Plaintiff and counterdefendant Ancora Technologies, Inc. ("Ancora") and defendant and counterclaimant Apple Inc. ("Apple") jointly submit this proposed briefing schedule:

Event	The Parties Proposed Deadlines
Filing of Joint Claim Construction and Prehearing Statement	March 26, 2012
Completion of Claim Construction Discovery (N.D. Patent L.R. 4-4)	April 25, 2012
Ancora Opening <i>Markman</i> Brief Due (N.D. Patent L.R. 4-5(a) & Judge Rogers Standing Order ¶ 9)	May 9, 2012
Apple Opposition <i>Markman</i> Brief Due (N.D. Patent L.R. 4-5(b))	June 5, 2012
Ancora Reply <i>Markman</i> Briefs Due (N.D. Patent L.R. 4-5(c))	June 22, 2012
Technology Tutorial	June 29, 2012 at 2 p.m.
Exchange of <i>Markman</i> exhibits and visual aids (Judge Rogers Standing Order ¶ 11)	July 10, 2012
Markman Hearing (N.D. Patent L.R. 4-6)	July 11, 2012 at 2 p.m. (if no trials on Court calendar for week of July 9, Court will consider moving to July 9 or 10)

Respectfully submitted,

## **BROOKS KUSHMAN P.C.**

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28

TES DISTRICT COURT	
NORTHERN DISTRICT OF CALIFORNIA	
Case No. 4:11-cv-06357-YGR	
[ <del>PROPOSED</del> ] ORDER	
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EFING SCHEDULE is granted and all parties shall	
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vonne Gonzalez Rogers	
NITED STATES DISTRICT JUDGE	