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Attorney for Defendants
 PANTECH CO., LTD.; PANTECH WIRELESS,
 INC.

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 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **(OAKLAND DIVISION)**

13 MAP TOOL INC.,)

Plaintiff,)

vs.)

16 PANTECH CO., LTD, ET AL.)

Defendants.)

Case No. 4:13-cv-04945-YGR)

~~PROPOSED~~ SCHEDULING ORDER)

DEMAND FOR JURY TRIAL)

Pursuant to Federal Rule of Civil Procedure 26(f), Civil Local Rule 16-9 and the Civil Minutes from the March 17, 2014 Case Management Conference (D.I. 30), Plaintiff Map Tool Inc. and Defendants Pantech Co., LTD and Pantech Wireless, Inc. (“Pantech”), hereby submit this Proposed Scheduling Order.

Event	Proposed Deadline
Plaintiff’s Infringement Contentions and accompanying document production due (Patent L.R. 3-1 and 3-2)	March 31, 2014
Defendants Invalidity Contentions and accompanying document production due (Patent L.R. 3-3 and 3-4)	May 15, 2014
Parties exchange proposed claim terms for construction (Patent L.R. 4-1) (no later than 14 days after invalidity contentions)	May 29, 2014
Parties exchange proposed constructions for the identified claim terms and identify all supporting evidence and experts (Patent L.R. 4.2) (no later than 21 days after exchange of proposed terms)	June 19, 2014
Deadline for filing of requests to have more than ten claim terms construed (Standing Order for Patent Cases ¶ 4)	June 26, 2014
Joint Claim Construction and Prehearing Statement due (Patent L.R. 4-3) (No later than 60 days after service of Invalidity contentions)	July 14, 2014
Deadline to complete all discovery related to claim construction (Patent L.R. 4-4) (no later than 30 days after filing of Joint Claim Construction statement)	August 13, 2014
Plaintiff’s opening claim construction brief due (Patent L.R. 4-5(a)) (no later than 45 days after Joint Claim Construction and prehearing statement)	August 28, 2014
Defendants’ responsive claim construction brief due (14 days after opening brief)	September 11, 2014
Plaintiff’s reply claim construction brief due (7 days after responsive brief)	September 18, 2014
Amended, final Joint Claim Construction Statement due (Standing Order for Patent Cases ¶ 6)	September 18, 2014
Deadline for disclosure of materials associated with any opinion of counsel upon which the party intends to rely (Patent L.R. 3-7)	50 days after Court issues claim construction ruling
Claim construction tutorial (Standing Order for Patent Cases ¶ 7)	October 1, 2014 1:00 PM per D.I. 30.
Deadline to exchange copies of	October 6, 2014.

Event	Proposed Deadline
demonstrative exhibits and visual aids to be used at the claim construction hearing (Standing Order for Patent Cases ¶ 11)	
Claim construction hearing (Patent L.R. 4-6 and Standing Order for Patent Cases ¶ 9)	October 8, 2014 at 1:00 PM per D.I. 30.
Deadline to complete fact discovery	To be set at the Subsequent Case Management Conference per the Court's Standing Order for Patent Cases.
Deadline to seek leave of the Court to amend pleadings	
Initial expert disclosures and reports due	
Rebuttal expert disclosures and reports due	
Deadline to complete expert discovery	
Dispositive and Daubert motions due	
Deadline to exchange proposed Motions <i>in Limine</i> (Court's Pretrial Instructions in Civil Cases ¶ 4.a)	
Deadline to exchange exhibits and exhibit lists (Court's Pretrial Instructions in Civil Cases ¶ 6.a)	
Deadline to meet and confer regarding Joint Pretrial Conference Statement (Court's Pretrial Instructions in Civil Cases ¶ 2)	
Joint Pretrial Conference Statement due (Court's Pretrial Instructions in Civil Cases ¶ 2)	
Motions <i>in Limine</i> due (Court's Pretrial Instructions in Civil Cases ¶ 4.b)	
Oppositions to Motions <i>in Limine</i> due (Court's Pretrial Instructions in Civil Cases ¶ 4.b)	
Deadline for pretrial filings and submission of Joint Trial Readiness Binder and Motions <i>in Limine</i> Binder (Court's Pretrial Instructions in Civil Cases ¶¶ 3 and 4.c)	
Final pretrial conference (Court's Pretrial Instructions in Civil Cases ¶ 1)	
Deadline to submit three sets of trial exhibits (Court's Pretrial Instructions in Civil Cases ¶ 6.c)	
Commencement of jury trial (Court's Pretrial Instructions in Civil Cases ¶ 1)	

Dated: March 21, 2014

Respectfully submitted,

/s/ Michael C. Ting
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BAKER & MCKENZIE LLP

Dated: March 21, 2014

By: /s/ D. James Pak
D. James Pak


Attorney for Defendants
PANTECH CO., LTD. and PANTECH WIRELESS, INC.

1 **~~PROPOSED~~ SCHEDULING ORDER**

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3 The above SCHEDULING ORDER PURSUANT TO FED. R. CIV. P. 26(f) AND CIV.
4 L.R. 16-9 is approved. All parties shall comply with its provisions.
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6 IT IS SO ORDERED.

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8 Dated: March 25, 2014

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10 Hon. YVONNE GONZALES ROGERS
11 United States District Judge
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