

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-RNS

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

JOINT MOTION FOR AMENDED SCHEDULING ORDER

Apple, Inc. (“Apple”) and Motorola Solutions, Inc. and Motorola Mobility, Inc. (“Motorola”) (collectively, the “Parties”) jointly move the Court to amend its September 14, 2011 Order on Joint Motion for Amended Scheduling Order. (D.E. 113). In support of their Motion, the Parties state that:

1. This action involves claims by both Motorola and Apple for patent infringement with respect to various patents.

2. On February 1, 2011, the Court entered a Scheduling Order For Pretrial Conference and Trial (“Scheduling Order”).

3. On May 27, 2011, the Court modified the Scheduling Order and entered a Modified Scheduling Order (“Modified Scheduling Order”).

4. On September 12, 2011, the parties jointly proposed amending the case schedule because of the timing of the *Markman* hearing, which was held from October 17-19, 2011, before the Honorable Ursula Ungaro. (D.E. 111). The Court adopted the parties' proposed schedule. (D.E. 113).

5. The Court issued its Claim Construction Order on December 1, 2011. (D.E. 194).

6. To accommodate additional time for fact and expert discovery, the parties jointly propose further amending the case schedule as follows:

	<u>Current deadline</u>	<u>Proposed new deadline</u>
Deadline for the end of fact discovery (interrogatories and requests for admission)	January 17, 2012	January 17, 2012 (no change)
Deadline for the end of fact discovery (all other forms of discovery)	January 17, 2012	February 10, 2012
Opening expert reports	January 27, 2012	February 17, 2012
Rebuttal expert reports	February 24, 2012	March 16, 2012
Cutoff for expert depositions and other expert-related discovery	March 23, 2012	April 13, 2012
Motions for summary judgment	April 6, 2012	April 20, 2012

7. The Parties' proposal does not alter any other deadlines in the case.

WHEREFORE, the Parties respectfully request that the Court enter the proposed Amended Scheduling Order, attached as Exhibit "A" hereto.

Dated: December 16, 2011

Respectfully submitted,

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