

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

Case No. 1:10-cv-23580-RNS/TEB

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 TO AMEND SCHEDULING ORDER

Apple, Inc. (“Apple”) and Motorola Solutions, Inc. and Motorola Mobility, Inc. (“Motorola”) (collectively, the “Parties”) jointly move the Court to amend its December 19, 2011, Amended Scheduling Order (D.E. 206). In support of their Motion, the Parties state that:

1. The date for the close of fact discovery is currently set for March 16, 2012. Additionally, under the current schedule, the deadlines to file opening expert reports, to file rebuttal expert reports, and to complete expert discovery are set for March 16, 2012, April 13, 2012, and May 11, 2012, respectively. There currently is no deadline by which Apple is required to narrow its asserted claims.

2. To allow the parties sufficient time to conduct depositions of witnesses prior to

the deadlines for the close of fact discovery, the submission of expert reports, and the expert discovery, and in furtherance of allowing Apple to narrow its asserted claims by the deadlines set forth below, the parties request the following deadlines be implemented by this Court:

Event	Proposed Deadlines
Apple to substantially narrow asserted claims	March 22, 2012
Close of fact discovery	March 28, 2012
Deadline to file opening expert reports	March 30, 2012
Deadline to file rebuttal expert reports	April 27, 2012
Expert discovery to be completed	May 15, 2012

3. The Parties’ proposal affects no other deadlines in this case. The Parties expressly reserve the right to request further extensions as appropriate.

The parties therefore request that the Court enter the amended scheduling order attached as Exhibit A.

Dated: March 8, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 8, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system. I also certify that the foregoing document is being served this date on all counsel of record or pro se parties on the Service List below in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or; in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward M. Mullins

Edward M. Mullins (Fla. Bar No. 863920)

SERVICE LIST

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Case No.: 1:10-Civ-23580-RNS/TEB

United States District Court, Southern District of Florida

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