

EXHIBIT A

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

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

JURY TRIAL DEMANDED

[PROPOSED] SCHEDULING ORDER

The above-captioned case is set for Pretrial Conference at _____ on _____ before Honorable Ursula Ungaro, at the United States Courthouse, 400 N. Miami Avenue, 12th Floor, Courtroom 4, Miami, Florida. The above-captioned case is set for TRIAL during the ____ week period commencing _____ at 9:00 a.m., before the Honorable Ursula Ungaro.

The parties are hereby ORDERED to adhere to the following case schedule:

Event	Deadline
Deadline to Amend Pleadings	January 28, 2011
Deadline to Add Additional Parties	January 28, 2011
Deadline for Parties to Submit Joint Proposed Protective Order	January 28, 2011
Deadline to Disclose Initial Infringement Contentions and Asserted Claims	
Deadline to Disclose Initial Invalidity and Unenforceability Contentions	
Deadline to Exchange List of Claim Terms and Proposed Constructions	
Deadline for Disclosures Pursuant to Rule 26(a)(2)	
Deadline for parties to file joint claim construction statement	
Deadline to File Opening Claim Construction Brief	
Deadline to File Responsive Claim Construction Brief	
Claim Construction Hearing (if granted)	
Deadline to File Opening Expert Reports (Liability/Damages)	
Deadline to File Rebuttal Expert Reports (Liability/Damages)	
End of Discovery	
Deadline to File Motions for Summary Judgment	

Event	Deadline
Deadline for filing all other pretrial motions	
Deadline for all Rule 26 Disclosures	
Deadline for all Rule 26 Objections	
<i>In limine</i> motions filed and served	
Oppositions to <i>in limine</i> motions filed and served	
Final pre-trial conference	
Trial	

It is further ORDERED that:

Discovery shall be governed by the Federal Rules of Civil Procedure, with the exceptions that:

- (1) there shall be a total of 30 interrogatories permitted per side;
- (2) there shall be a total of 40 depositions permitted per side;
- (3) with regard to Rule 30(b)(6) depositions, each side shall be limited to 50 hours total of 30(b)(6) testimony. 30(b)(6) testimony and depositions of expert witnesses shall not count toward the deposition limit;
- (4) there shall be a total of 200 requests for production permitted per side;
- (5) there shall be a total of 100 requests for admission permitted per side, excluding requests for admission that are solely for purposes of authenticating documents.

To the extent this Order conflicts with the Local Rules, this Order supersedes them.

DONE and ORDERED this ____ day of _____ at Miami, Florida.

URSULA UNGARO
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2010, I caused the foregoing document to be electronically filed with the Clerk of Court using the ECF system, which will make this document available to all counsel of record for viewing and downloading from the ECF system.

/s/ Edward M. Mullins

Edward M. Mullins

SERVICE LIST

Motorola Mobility, Inc. v. Apple, Inc.
Case No.: 1:10-23580-CIV-UNGARO/Simonton
United States District Court, Southern District of Florida

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