

aee

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GROUPON INC.,

PLAINTIFF,

v.

MOBGOB LLC.,

DEFENDANT.

Civil Action No. 10-CV-07456

Hon. William J. Hibbler

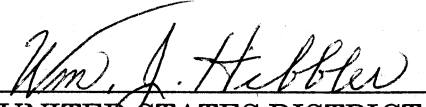
~~JOINT PROPOSED~~ SCHEDULING ORDER

Event	Scheduled Time	Due Date
Initial Disclosures	Within 14 Days of Defendant's Answer - LPR 2.1	March 2, 2011 (by Agreement)
Fact Discovery Begins	Upon exchange of Initial Disclosures - LPR 1.3	March 2, 2011
Initial Infringement Contentions	Within 14 Days of Initial Disclosures - LPR 2.2	March 16, 2011
Initial Non-infringement and Invalidity Contentions	Within 14 Days of Initial Infringement Contentions - LPR 2.3	March 30, 2011
Initial Response to Invalidity Contentions	Within 14 Days of Non-Infringement Contentions - LPR 2.5	April 13, 2011
Final Infringement, Unenforceability and Invalidity Contentions	Within 21 weeks of Initial Infringement Contentions - LPR 3.1	August 10, 2011
Final Non-Infringement, Enforceability and Validity Contentions	Within 28 days of Final Infringement/Invalidity Contentions - LPR 3.2	September 7, 2011
Exchange of Claim Terms Needing Construction	Within 14 days of Final Non-Infringement/Validity Contentions - LPR 4.1	September 21, 2011

Event	Scheduled Time	Due Date
Parties Agree on up to 10 Terms to Submit for Construction by the Court	Within 7 days of Exchanging of Claim Terms Needing Construction - LPR 4.1(b)	September 28, 2011
Close of Fact Discovery Until Entry of Claim Construction Ruling	Within 28 days of Exchange of Claim Terms - LPR 1.3	October 19, 2011
Opening Claim Construction Brief by Party Opposing Infringement	Within 35 days of Exchange of Claim Terms - LPR 4.2	October 26, 2011
Submission of Joint Appendix	Concurrent with Opening Claim Construction Brief - LPR 4.2(b)	October 26, 2011
Responsive Claim Construction Brief by Party Asserting Infringement	Within 28 days of Opening Claim Construction Brief - LPR 4.2 (c)	November 23, 2011
Reply Claim Construction Brief by Party Opposing Infringement	Within 14 days of Responsive Claim Construction Brief - LPR 4.2 (d)	December 7, 2011
Joint Claim Construction Chart	Within 7 days of Reply Claim Construction Brief - LPR 4.2(f)	December 14, 2011
Exhibits Exchanged For Claim Construction Hearing	At least 3 days prior to Hearing - LPR 4.3	January 9, 2012
Claim Construction Hearing	At the Court's convenience on or after January 12, 2012 (by agreement)	TBD
Claim Construction Ruling		TBD
Fact Discovery Re-Opens	Concurrent with Claim Construction Ruling - LPR 1.3	Date of Claim Construction Ruling
Final Date for Parties to Amend Pleadings or Join Parties		1 week after Claim Construction Ruling
Discovery Concerning Opinions of Counsel Begins	35 days prior to Close of Fact Discover - LPR 3.6	1 week after Claim Construction Ruling

Event	Scheduled Time	Due Date
Close of Fact Discovery After Claim Construction Ruling	42 days after Claim Construction Ruling - LPR 1.3	6 weeks after Claim Construction Ruling
Expert Reports of Parties Addressing Issues for which they Bear the Burden of Proof	Within 21 days of the Close of Fact Discovery - LPR 5.1(b)	9 weeks after Claim Construction Ruling
Rebuttal Expert Reports	Within 35 days of Initial Expert Reports - LPR 5.1(c)	14 weeks after Claim Construction Ruling
Completion of Expert Witness Depositions	Within 35 days of Rebuttal Expert Reports - LPR 5.2	19 weeks after Claim Construction Ruling
Final Date - Dispositive Motions	Within 28 days of Completion of Expert Discovery - LPR 6.1	23 weeks after Claim Construction Ruling
Pretrial Disclosures - Rule 26(a)(3) Witness Lists, Designation of Witnesses by Deposition and Exhibit Lists	30 days prior to Trial - Fed. R. Civ. P. 26(a)(3)(B)	30 days prior to Trial
Objections under Rule 26(a)(3)	Within 14 days of Pretrial Disclosures	2 weeks after Pretrial Disclosures
Final Pretrial Conference	At the Court's convenience at least 3 weeks after Pretrial Disclosures	TBD
Trial	At the Court's convenience at least 1 week after Final Pretrial Conference	TBD

Signed the 16th day of FEBRUARY, 2011


 UNITED STATES DISTRICT JUDGE
 Hon. William J. Hibbler