

EXHIBIT A

PLAINTIFF	DEFENDANTS	
September 29, 2004 – <i>Agfa</i> November 1, 2004 - <i>Acer</i>		Parties exchange initial disclosures pursuant to Fed. R. Civ. P.26(a)(1).
October 18, 2004		Plaintiff to serve “Disclosure of Asserted Claims and Preliminary Infringement Contentions” and supporting documents.
November 1, 2004	December 3, 2004	Defendants serve “Preliminary Invalidity Contentions” as defined in the Joint Report Concerning Discovery and Scheduling. Defendants opposed the mandatory disclosure of documents as proposed by Plaintiff in the Joint Report Concerning Discovery and Scheduling concurrent with service of the invalidity contentions.
November 17, 2004		Each party shall simultaneously exchange a list of claim terms, phrases, or clauses which that party contends should be construed by the Court, and identify any claim element which that party contends should be governed by 35 U.S.C. §112(6).
December 3, 2004	December 17, 2004	Parties exchange “Preliminary Claim Constructions and Extrinsic Evidence” as defined in the Joint Report Concerning Discovery and Scheduling.
- - -	January 7, 2004	The parties shall simultaneously exchange a preliminary identification of any testimony of percipient and expert witnesses they intend to offer in rebuttal to any testimony of percipient and expert witnesses that the other side identified they contend supports their claim construction. With respect to any such rebuttal witness, percipient or expert, the parties shall also provide a brief description of the substance of that witness’ proposed testimony.

December 15, 2004	- - -	<p>Plaintiff proposes that the parties file “Joint Claim Construction and Prehearing Statement” as defined in the Joint Report Concerning Discovery and Scheduling.</p> <p>Defendants believe this statement is unnecessary in light of their proposed briefing schedule.</p>
- - -	January 12, 2005	Deadline to Meet and Confer regarding Claim Construction Issues.
December 22, 2004	January 26, 2005	Deadline to complete all discovery relating to claim construction, including any depositions with respect to claim construction of any witness, including experts, identified by a party with their proposed claim constructions or as one of their rebuttal witnesses on claim construction.
January 17, 2005	February 2, 2005	<p>Plaintiff proposes that all parties simultaneously serve and file their Opening Markman Brief and any evidence supporting their proposed claim construction.</p> <p>Defendants propose the Plaintiff to serve and file its Opening Markman Brief and any evidence supporting its proposed claim construction.</p>
February 7, 2005	March 2, 2005	<p>Plaintiff proposes that all parties simultaneously serve and file their rebuttal Markman briefs and any evidence directly rebutting the supporting evidence contained in the opposing parties’ Opening Markman briefs.</p> <p>Defendants propose that they file their Opening Markman brief and their Response in Opposition to Plaintiff’s Opening Markman Brief.</p>
- - -	March 16, 2005	<p>Plaintiff makes no further proposals about Markman briefing.</p> <p>Defendants’ proposed deadline for Plaintiff to serve and file its Reply In Support of its Markman Brief and Response in Opposition to Defendants’ Opening Markman Brief(s), and any evidence directly rebutting the supporting evidence contained in Defendants’ Response(s).</p>

---	March 30, 2005	Plaintiff makes no further proposals about Markman briefing. Defendants' proposed deadline for each Defendant to serve and file its Reply In Support of its Markman Brief, and any evidence directly rebutting the supporting evidence contained in Plaintiff's Response in Opposition to Defendant's Opening Markman Brief.
---	April 6, 2005	Technology tutorial
February 8 , 2005 (or later)	April 7, 2005	Claim Construction Hearing 9:00 a.m. in Texarkana, Texas
---	May 1, 2005	<i>Agfa</i> and <i>Acer</i> case only – deadline to agree on number of experts.
April 11, 2005	---	Amend Pleadings without leave of court on this date, or 30 days after entry of the Court's claim construction ruling, whichever is later. (It is not necessary to file a motion for leave to amend pleadings prior to this date. It is necessary to file a motion for leave to amend after this date).
April 25, 2005	---	Answer Amended Pleadings
15 days after entry of the court's ruling on claim construction		Parties agree that Plaintiff shall serve updated, amended and/or modified Infringement Contentions in light of the court's ruling on claim construction. Plaintiff proposes that Amendment or modification of these contentions after this date may be made only by order of the Court, which shall be entered only upon a showing of good cause. Defendants oppose this additional restriction.
May 16, 2005	---	Disclosure of opinions of counsel.

30 days after entry of the court's ruling on claim construction		<p>Parties agree that Defendants shall serve updated, amended and/or modified Invalidity Contentions in light of the court's ruling on claim construction.</p> <p>Plaintiff proposes that amendment or modification of these contentions after this date may be made only by order of the Court, which shall be entered only upon a showing of good cause.</p> <p>Defendants oppose this additional restriction.</p>
June 1, 2005		Parties identify experts
June 15, 2005	June 15, 2005 or 45 days after entry of the court's ruling on claim construction, whichever is later.	Deadline for Service of Expert Reports by the Party with the Burden of Proof on the Claim or Defense at Issue.
June 15, 2005		Fact Discovery deadline. All fact discovery shall be commenced in time to be completed by this date.
July 15, 2005	July 15, 2005 or 75 days after entry of the court's ruling on claim construction, whichever is later	Deadline for Service of Rebuttal Expert Reports – Rebuttal expert testimony shall mean expert testimony that is solely intended to contradict or rebut expert testimony on the same subject matter identified by another party pursuant to Fed. R. Civ. P. 26(a)(c) and Local Rule CV-26(b).
May 1, 2005	July 1, 2005	Deadline to conduct mediation.
July 18, 2005	August 1, 2005 or 92 days after entry of the court's ruling on claim construction, whichever is later	Close of Expert Discovery -- All expert discovery shall be commenced in time to be completed by this date.
July 1, 2005	August 8, 2005 or 99 days after entry of the court's ruling on claim construction, whichever is later.	Dispositive Motions and any other motions that may require a hearing (including <i>Daubert</i> motions). Dispositive Motions may be filed earlier. Responses and Replies to be filed in accordance with Local Rule CV-7.
August 29, 2005		Pretrial disclosures pursuant to Fed. R. Civ. P. 26(a)(3) due.

September 12, 2005	Objection to pretrial disclosures due. See Rule 26(a)(3) for details.
September 14, 2005	Plaintiff provides Plaintiff's portions of Joint Final Pretrial Order & charge to Defendants.
September 16, 2005	Motions in limine to be filed.
September 21, 2005	Defendants provide Defendants' portions of Joint Final Pretrial Order & charge to Plaintiff
September 26, 2005	Meet & confer re: pretrial order & charge
September 28, 2005	Joint Final Pretrial Order due. Joint Proposed Jury Instructions and Verdict Form due
September 30, 2005	Responses to motions in limine due
October __, 2005	Final Pretrial Conference 9:00 a.m. in Marshall, Texas
October __, 2005	Jury Selection 9:00 a.m. in Marshall, Texas