

HONORABLE JAMES L. ROBERT

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

ARKON RESOURCES, INC.,

Defendant.

**CONSOLIDATED CASE**

**Lead Case No. 2:15-cv-01984-JLR**

**STIPULATED MOTION AND ~~{PROPOSED}~~  
ORDER FOR REVISED SCHEDULE**

**NOTE ON MOTION CALENDAR:  
Friday, March 3, 2017**

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

HIGH GEAR SPECIALTIES INC.,

Defendant.

Case No. 2:15-cv-01985-JLR

JURY TRIAL DEMANDED

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

WIRELESS ACCESSORY SOLUTIONS,  
LLC, d/b/a IBOLT – WIRELESS  
ACCESSORY SOLUTIONS, LLC,

Defendant.

Case No. 2:15-cv-02024-JLR

JURY TRIAL DEMANDED

STIP. MTN. FOR REVISED SCHEDULE  
**Case Nos. 2:15-cv-01984-JLR,**  
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,  
2:16-cv-00109-JLR

FENWICK & WEST LLP  
1191 SECOND AVENUE, 10TH FLOOR  
SEATTLE, WASHINGTON 98101  
TELEPHONE 206.389.4510  
FACSIMILE 206.389.4511

1 NATIONAL PRODUCTS INC.,

Case No. 2:16-cv-00109-JLR

2 Plaintiff,

3 v.

4 BRACKETRON, INC.

JURY TRIAL DEMANDED

5 Defendant.

6  
 7 Pursuant to the Court’s February 23, 2017 Minute Entry (Dkt. No. 71) and Order Setting  
 8 *Markman* Hearing (Dkt. No. 72), plaintiff National Products Inc. (“NPI”) and defendants Arkon  
 9 Resources, Inc. (“Arkon”), High Gear Specialties Inc. (“High Gear”), Wireless Accessory  
 10 Solutions, LLC, d/b/a IBOLT – Wireless Accessory Solutions, LLC (“IBOLT”), and Bracketron,  
 11 Inc. (“Bracketron”) (collectively, “Defendants”) jointly submit the following revised proposed  
 12 schedule to govern the above-captioned matters.

13 The parties ask that the Court enter the following schedule of deadlines:

Event	Parties’ Proposal
Joint Claim Construction and Prehearing Statement (LPR 132)	July 10, 2017
Parties File Simultaneous Opening <i>Markman</i> Briefs (LPR 134)	July 20, 2017
Parties File Simultaneous Responsive <i>Markman</i> Briefs (LPR 134)	August 10, 2017
Tutorial (if necessary)	To be set by the Court
<i>Markman</i> Hearing (LPR 135)	September 19, 2017 at 9:00 a.m.
Reports from Expert Witnesses Under FRCP 26(a)(2)	December 1, 2017
Rebuttal Expert Reports Due	December 22, 2017
All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	January <sup>26</sup> <del>27</del> , 2018

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Event	Parties' Proposal
Discovery Completed By	February 1, 2018

In addition to the proposed deadlines set forth above, the parties agree that if any discovery requests were pending when the Court granted Defendants' requested stay (Dkt. No. 66), the deadline for responding to those requests is hereby extended fourteen (14) days from the date of entry of this order.

1 Dated: March 3, 2017

Respectfully submitted,

2 By: s/Jonathan T. McMichael

3 David K. Tellekson, WSBA No. 33523  
4 Ewa M. Davison, WSBA No. 39524  
5 Jonathan T. McMichael, WSBA No. 49895  
6 FENWICK & WEST LLP  
7 1191 Second Avenue, 10th Floor  
8 Seattle, WA 98101  
9 Tel: 206.389.4510  
10 Fax: 206.389.4511  
11 Email: dtellekson@fenwick.com  
12 edavison@fenwick.com  
13 jcmichael@fenwick.com

*Attorneys for Plaintiff  
National Products Inc.*

10 Dated: March 3, 2017

Respectfully submitted,

11 By: s/James E. Breitenbucher

12 Jayson W. Sowers, WSBA No. 27618  
13 James E. Breitenbucher, WSBA No. 27670  
14 RIDDELL WILLIAMS P.S.  
15 1001 Fourth Avenue, Suite 4500  
16 Seattle, WA 98154-1192  
17 Tel: 206.624.3600  
18 Fax: 206.389.1708  
19 Email: jsowers@riddellwilliams.com  
20 jbreitenbucher@riddellwilliams.com

21 Marc A. Karish (admitted *pro hac vice*)  
22 KARISH & BJORGUM, PC  
23 119 E. Union Street, Suite B  
24 Pasadena, CA 91103  
25 Tel: 213.785.8070  
26 Fax: 213.995.5010  
27 Email: marc.karish@kb-ip.com

*Attorneys for Defendant  
Arkon Resources, Inc.*

*Attorneys for Defendant  
Wireless Accessory Solutions, LLC,  
d/b/a iBolt – Wireless Accessory  
Solutions, LLC*

28 STIP. MTN. FOR REVISED SCHEDULE  
Case Nos. 2:15-cv-01984-JLR,  
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,  
2:16-cv-00109-JLR

1 Dated: March 3, 2017

Respectfully submitted,

2  
3 By: s/Daniel J. Velloth

Rodney L. Umberger, WSBA No. 24948  
Daniel J. Velloth, WSBA No. 44379  
WILLIAMS, KASTNER & GIBBS PLLC  
601 Union Street, Ste. 4100  
Seattle, WA 98101-2380  
Tel: 206.628.6600  
Fax: 206.628.6611  
Email: rumberger@williamskastner.com  
dvelloth@williamskastner.com

4  
5  
6  
7  
8 Thomas L. Kautz (*pro hac vice* forthcoming)  
GRAY ROBINSON, P.A.  
401 East Las Olas Blvd., Ste. 1000  
Fort Lauderdale, FL 33301  
Tel.: 954.761.8111  
Fax: 954.761.8112  
E-mail: tom.kautz@gray-robinson.com

9  
10  
11  
12 *Attorneys for Defendant*  
*High Gear Specialties Inc.*

13 Dated: March 3, 2017

Respectfully submitted,

14  
15 By: s/Robert J. Carlson

16 Robert J. Carlson, WSBA No. 18455  
LEE & HAYES PLLC  
One Convention Place  
701 Pike Street, Ste. 1600  
Seattle, WA 98101  
Tel: 206.315.4001  
Fax: 206.315.4004  
Email: bob@leehayes.com

17  
18  
19  
20 Terrance C. Newby (*admitted pro hac vice*)  
MASLON LLP  
Wells Fargo Center  
90 South Seventh St., Ste. 3300  
Minneapolis, MN 55402  
Tel: 612.672.8328  
Fax: 612.672.8328  
Email: terry.newby@maslon.com

21  
22  
23  
24 *Attorneys for Defendant*  
*Bracketron, Inc.*

**ORDER**

This matter is before the Court on the parties' Stipulated Motion for Revised Schedule ("the Stipulated Motion"). The Court, having considered this matter and the record in this case, ORDERS as follows:

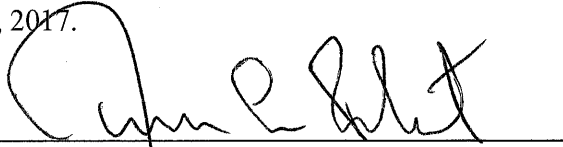
The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Joint Claim Construction and Prehearing Statement (LPR 132)	July 10, 2017
Parties File Simultaneous Opening <i>Markman</i> Briefs (LPR 134)	July 20, 2017
Parties File Simultaneous Responsive <i>Markman</i> Briefs (LPR 134)	August 10, 2017
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All motions related to discovery must be noted on the motion calendar pursuant to LCR 7(d)(3) or LCR 37(a)(2)	January <sup>26</sup> <del>27</del> , 2018
Discovery Completed By	February 1, 2018

*JLR*

SO ORDERED this 6<sup>th</sup> day of March, 2017.



HONORABLE JAMES L. ROBERT  
UNITED STATES DISTRICT JUDGE

1 Presented by:

2  
3 By: s/Jonathan T. McMichael

4 David K. Tellekson, WSBA No. 33523  
5 Ewa M. Davison, WSBA No. 39524  
6 Jonathan T. McMichael, WSBA No. 49895  
7 FENWICK & WEST LLP  
8 1191 Second Avenue, 10th Floor  
9 Seattle, WA 98101  
10 Tel: 206.389.4510  
11 Fax: 206.389.4511  
12 Email: dtellekson@fenwick.com  
13 edavison@fenwick.com  
14 jcmichael@fenwick.com

15 *Attorneys for Plaintiff*  
16 *National Products Inc.*

17 By: s/James E. Breitenbucher

18 Jayson W. Sowers, WSBA No. 27618  
19 James E. Breitenbucher, WSBA No. 27670  
20 RIDDELL WILLIAMS P.S.  
21 1001 Fourth Avenue, Suite 4500  
22 Seattle, WA 98154-1192  
23 Tel: 206.624.3600  
24 Fax: 206.389.1708  
25 Email: jsowers@riddellwilliams.com  
26 jbreitenbucher@riddellwilliams.com

27 Marc A. Karish (admitted *pro hac vice*)  
28 KARISH & BJORGUM, PC  
119 E. Union Street, Suite B  
Pasadena, CA 91103  
Tel: 213.785.8070  
Fax: 213.995.5010  
Email: marc.karish@kb-ip.com

*Attorneys for Defendant*  
*Arkon Resources, Inc.*

*Attorneys for Defendant*  
*Wireless Accessory Solutions, LLC,*  
*d/b/a iBolt – Wireless Accessory Solutions, LLC*

1  
2 By: s/Daniel J. Velloth

3 Rodney L. Umberger, WSBA No. 24948  
4 Daniel J. Velloth, WSBA No. 44379  
5 WILLIAMS, KASTNER & GIBBS PLLC  
6 601 Union Street, Ste. 4100  
7 Seattle, WA 98101-2380  
8 Tel: 206.628.6600  
9 Fax: 206.628.6611  
10 Email: rumberger@williamskastner.com  
11 dvelloth@williamskastner.com

12 Thomas L. Kautz (*pro hac vice* forthcoming)  
13 GRAY ROBINSON, P.A.  
14 401 East Las Olas Blvd., Ste. 1000  
15 Fort Lauderdale, FL 33301  
16 Tel.: 954.761.8111  
17 Fax: 954.761.8112  
18 E-mail: tom.kautz@gray-robinson.com

19 *Attorneys for Defendant*  
20 *High Gear Specialties Inc.*

21  
22 By: s/Robert J. Carlson

23 Robert J. Carlson, WSBA No. 18455  
24 LEE & HAYES PLLC  
25 One Convention Place  
26 701 Pike Street, Ste. 1600  
27 Seattle, WA 98101  
28 Tel: 206.315.4001  
Fax: 206.315.4004  
Email: bob@leehayes.com

Terrance C. Newby (*admitted pro hac vice*)  
MASLON LLP  
Wells Fargo Center  
90 South Seventh St., Ste. 3300  
Minneapolis, MN 55402  
Tel: 612.672.8328  
Fax: 612.672.8328  
Email: terry.newby@maslon.com

*Attorneys for Defendant*  
*Bracketron, Inc.*



**CERTIFICATE OF SERVICE**

I, Sharie L. Parks, hereby certify that on March 3, 2017, I caused the foregoing **STIPULATED MOTION AND [PROPOSED] ORDER FOR REVISED SCHEDULE** to be served on the following parties as indicated below:

<p><b>Jayson W. Sowers</b> (WSBA No. 27618)  <b>James E. Breitenbucher</b> (WSBA No. 27670)                  RIDDELL WILLIAMS P.S.                  1001 Fourth Avenue, Suite 4500                  Seattle, WA 98154-1192</p> <p><i>Attorneys for Defendants Arkon Resources, Inc.;</i>  <i>Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email</p> <p>jsowers@riddellwilliams.com                  jbreitenbucher@riddellwilliams.com</p>
<p><b>Marc A. Karish</b> (admitted <i>pro hac vice</i>)                  KARISH &amp; BJORGUM, PC                  119 E. Union Street, Suite B                  Pasadena, CA 91103</p> <p><i>Attorneys for Defendant Arkon Resources, Inc.;</i>  <i>Attorneys For Defendant Wireless Accessory Solutions, LLC, d/b/a iBolt – Wireless Accessory Solutions, LLC</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email</p> <p>marc.karish@kb-ip.com</p>
<p><b>Rodney L. Umberger</b> (WSBA No. 24948)  <b>Daniel J. Velloth</b> (WSBA No. 44379)                  WILLIAMS, KASTNER &amp; GIBBS PLLC                  601 Union Street, Ste. 4100                  Seattle, WA 98101-2380</p> <p><i>Attorneys for Defendant High Gear Specialties Inc.</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email [by agreement of counsel]</p> <p>rumberger@williamskastner.com                  dvelloth@williamskastner.com</p>
<p><b>Thomas L. Kautz</b> (admitted <i>pro hac vice</i>)                  GRAY ROBINSON, P.A.                  401 East Las Olas Blvd., Ste. 1000                  Fort Lauderdale, FL 33301</p> <p><i>Attorneys for Defendant High Gear Specialties Inc.</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email [by agreement of counsel]</p> <p>tom.kautz@gray-robinson.com</p>

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<p><b>Robert J. Carlson</b> (WSBA No. 18455)                  LEE &amp; HAYES PLLC                  One Convention Place                  701 Pike Street, Ste. 1600                  Seattle, WA 98101</p> <p><i>Attorneys for Defendant Bracketron, Inc.</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email [by agreement of counsel]                  bob@leehayes.com</p>
<p><b>Terrance C. Newby</b> (admitted <i>pro hac vice</i>)  <b>E. Casey Beckett</b> (admitted <i>pro hac vice</i>)  <b>Kristian C.S. Weir</b> (admitted <i>pro hac vice</i>)                  MASLON LLP                  Wells Fargo Center                  90 South Seventh St., Ste. 3300                  Minneapolis, MN 55402</p> <p><i>Attorneys for Defendant Bracketron, Inc.</i></p>	<p><input type="checkbox"/> By United States Mail  <input type="checkbox"/> By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>  <input type="checkbox"/> By Overnight Express Mail  <input type="checkbox"/> By Facsimile  <input type="checkbox"/> By Email [by agreement of counsel]                  terry.newby@maslon.com                  casey.beckett@maslon.com                  kristian.weir@maslon.com</p>

Dated: March 3, 2017

By: s/Sharie L. Parks  
 For Jonathan T. McMichael, WSBA No. 49895  
 FENWICK & WEST LLP