

1 HONORABLE THOMAS S. ZILLY

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 INTERNATIONAL BUSINESS
11 MACHINES CORPORATION,

12 Plaintiff,

13 v.

14 ZILLOW GROUP, INC.; and
15 ZILLOW, INC.,

16 Defendants.

Case No. 2:20-cv-00851-TSZ

**STIPULATED MOTION TO MODIFY
CASE SCHEDULE and ORDER**

17 Pursuant to Local Civil Rule 16(b)(6), Plaintiff International Business Machines Corporation
18 (“Plaintiff”) and Defendants Zillow Group, Inc. and Zillow, Inc. (“Defendants”), by and through
19 their respective counsel of record, hereby stipulate to modify the dates in the Court’s Minute Order
20 Setting Trial Date and Related Deadlines (D.I. 189) as set forth in the below table. After conferring
21 about document production, source code production, and deposition scheduling, the parties believe
22 these modifications will allow the parties to efficiently move forward with discovery.

23 As indicated below, the sole existing deadlines impacted by the parties’ proposed
24 modifications are those for opening and rebuttal expert reports. Good cause exists for modifying
25 these two deadlines because doing so will allow the parties sufficient time to account for the Court’s

STIPULATED MOTION TO MODIFY CASE SCHEDULE
and ORDER - 1
(Case No. 2:20-cv-00851-TSZ)

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1 claim construction order in their respective expert reports and will accordingly streamline discovery,
2 in that the Court's claim construction rulings will further define the issues in dispute.

Event	Current Deadline	New Deadline
Date by which Zillow makes available additional source code and source code review tools		September 8, 2022
IBM will serve 30(b)(6) notice on Zillow		September 8, 2022
Date by which IBM amends infringement contentions to cite source code Zillow has produced to date		October 6, 2022
Reports from expert witnesses under FRCP 26(a)(2) due	October 21, 2022	December 5, 2022
Rebuttal expert reports due	November 21, 2022	January 19, 2023
All discovery motions must be filed by	January 12, 2023	January 12, 2023
Discovery completed by	February 17, 2023	February 17, 2023
All dispositive motions must be filed by	March 2, 2023	March 2, 2023
All motions related to expert witnesses must be filed by	March 9, 2023	March 9, 2023

1 DATED this 2nd day of September, 2022.

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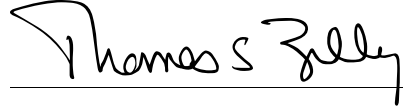
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23 *Attorneys for International Business Machines*
24 *Corporation*

1 **ORDER MODIFYING SCHEDULE**

2 IT IS SO ORDERED.

3 Dated this 2nd day of September, 2022.

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5 Thomas S. Zilly
6 United States District Judge