

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SAFE DRIVING TECHNOLOGIES, LLC

Plaintiff,

v.

FORD MOTOR COMPANY

Defendant.

Civil Action No. 21-cv-64-MN

**JURY TRIAL DEMANDED**

**STIPULATION TO MODIFY SCHEDULING ORDER**

Plaintiff Safe Driving Technologies, LLC (“Plaintiff”) and Defendant Ford Motor Company (“Defendant”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on April 16, 2021, this Court issued a Scheduling Order, which set a claim construction hearing date of January 28, 2021, a fact discovery deadline of April 29, 2022, and a trial date of February 21, 2023 (D.I. 21);

WHEREAS, on June 30, 2021, this Court, *sua sponte*, issued a modified Scheduling Order, which reset the claim construction hearing date to August 19, 2022 (D.I. 39);

WHEREAS, in light of the Court’s June 30, 2021 order regarding the claim construction hearing, an extension is requested for the parties to complete claim construction briefing, final infringement contentions, and final invalidity contentions;

WHEREFORE, the parties, by and through their counsel, respectfully request and stipulate to the following modifications of the Court’s scheduling order:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Modified Date</u>
Defendant’s Initial Invalidity Contentions	September 14, 2021	September 28, 2021

Claim Construction Issue Identification (Exchange of Terms for Construction)	N/A	November 22, 2021
Claim Construction Issue Identification (Exchange of proposed constructions)	September 21, 2021	December 15, 2021
Claim Construction - Plaintiff's Opening Brief	October 15, 2021	January 18, 2022
Claim Construction - Defendant's Answering Brief	November 12, 2021	February 14, 2022
Document Production Substantially Complete	November 17, 2021	March 1, 2022 <sup>1</sup>
Claim Construction - Plaintiff's Reply Brief	December 3, 2021	March 14, 2022
Joinder of Other Parties and Amendment of Pleadings	December 15, 2021	No change
Claim Construction - Defendant's Sur-Reply Brief	December 20, 2021	April 11, 2022
Claim Construction - Joint Claim Construction Brief	January 6, 2022	May 9, 2022
Claim Construction Hearing	<b>August 19, 2022 (see D.I. 39) (originally scheduled for January 28, 2022)</b>	No change
Supplementation - parties must finally supplement, <i>inter alia</i> , the identification of all accused products and of all invalidity references	March 4, 2022	March 15, 2022
Plaintiff's Final Infringement Contentions	April 1, 2022	April 8, 2022
Defendant's Final Invalidity Contentions	April 14, 2022	April 21, 2022
Fact Discovery Cut Off	April 29, 2022	No change

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<sup>1</sup> In the event a claim construction different from the ones proposed by the parties emerges after the Markman Hearing, the parties request the ability to move the Court for additional limited discovery and supplementation of final contentions and expert reports on this basis.

Opening Expert Reports	May 16, 2022	No change
Rebuttal Expert Reports	June 17, 2022	June 24, 2022
Reply Expert Reports	July 13, 2022	July 20, 2022
Technology Tutorial <sup>2</sup>	July 20, 2022	N/A
Expert Discovery Cut Off	August 12, 2022	No change
Case Dispositive Motions	September 2, 2022	No change
Jury Instructions, Voir Dire, and Special Verdict Forms	February 1, 2023	No change
The parties shall file with the Court the joint proposed final pretrial order in compliance with Local Rule 16.3(c) and the Court's Preferences and Procedures for Civil Cases	February 3, 2023	No change
Pretrial Conference	February 10, 2023 at 11:00 a.m.	No change
Jury Trial	February 21, 2023	No change
Judgment on Verdict and Post-Trial Status Report	7 days after a jury returns a verdict	No change

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<sup>2</sup> Not in the Original Scheduling Order, but offered for the convenience of the Court.

Dated: August 25, 2021

Respectfully submitted,

OF COUNSEL:

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Company*

IT IS SO ORDERED this 26th day of August 2021.

  
The Honorable Maryellen Noreika  
United States District Judge