Exhibit A

Event	Agreed Date	Caltech's Proposal	Defendants' Proposal
Fact Discovery Begins	Sept. 5, 2016		
Joint 26(f) Report due	Sept. 19, 2016		
Case Management Conference	Sept. 26, 2016		
Exchange of Initial Disclosures pursuant to Rule 26(a)	Sept. 26, 2016 (Apple/Broadcom) Oct. 10, 2016 (Cypress)		
Plaintiff to Serve Preliminary Infringement Contentions	Oct. 20, 2016		
Defendants to Serve Preliminary Invalidity Contentions	Dec. 15, 2016		
Exchange Claim Terms for Construction	Jan. 19, 2017		
Exchange Preliminary Claim Constructions	Feb. 9, 2017		
Joint Claim Construction Statement	Feb. 23, 2017		
Plaintiff to File Opening Claim Construction Brief	March 9, 2017		
Defendants to File Responsive Claim Construction Brief	March 30, 2017		
Amendment of Pleadings and Joinder of New Parties	Mar. 31, 2017		

Event	Agreed Date	Caltech's Proposal	Defendants' Proposal
Plaintiff to File Reply Claim Construction Brief		April 20, 2017	April 10, 2017[1]
Defendants to File Surreply Claim Construction Brief			April 21, 2017
Claim Construction Discovery Complete	May 11, 2017		
Tutorial	May 17, 2017		
Claim Construction Hearing	May 18, 2017		
Substantial Completion of Document Production	May 11, 2017[2]		
Plaintiff to Serve Final Identification of Accused Products	July 21, 2017		
Defendants to Serve Final Identification of Prior Art	July 21, 2017		
Defendants to Serve Identification of Opinions of Counsel	July 21, 2017		
Mediation Deadline	Aug. 9, 2017		
Post-Mediation Status Conference	Aug. 10, 2017		
Final Infringement Contentions	Aug. 25, 2017		
Final Invalidity	Sept. 15, 2017		

[1] Because neither party bears the burden of proof in claim construction, Defendants believe that the parties should have equal opportunities to be heard. If the Court prefers, Defendants alternatively propose that the parties engage in simultaneous briefing, with both sides filing opening briefs on March 9, 2017 and both sides filing responsive briefs on April 13, 2017.

[2] This date is subject to the parties reaching a separate agreement regarding the production of e-mail.

Event	Agreed Date	Caltech's Proposal	Defendants' Proposal
Contentions			
Fact Discovery Complete	Aug. 18, 2017[3]		
Opening Expert Reports (reports for issues on which a party bears the burden of proof)	Sept. 28, 2017		
Rebuttal Expert Reports (reports for issues on which a party does not bear the burden of proof)	Oct. 26, 2017		
Supplemental Expert Reports (*e.g.*, secondary considerations)	Nov. 9, 2017		
Expert Discovery Complete	Dec. 15, 2017		
Summary Judgment and Daubert Motions Due	Jan. 12, 2018		
Oppositions to Summary Judgement and Daubert Motions Due	Feb. 2, 2018		
Replies to Summary Judgement and Daubert Motions Due	Feb. 16, 2018		
Hearing on Summary Judgment and Daubert Motions	Mar. 1, 2018		
Pretrial Motion Filing Deadline		Mar. 22, 2018	Apr. 12, 2018
Pretrial conference		Apr. 19, 2018	May 3, 2018

[3] Caltech reserves the right to seek a brief extension of this deadline to complete all outstanding discovery.

Event	Agreed Date	Caltech's Proposal	Defendants' Proposal
Trial		May 8, 2018	TBD