IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARTIER, a division of RICHEMONT NORTH AMERICA, INC., Plaintiff and Counterclaim Defendant,	)	
v.	)	**Civil Action No. 06-1747 (RMC)**
WING HON METAL MANUFACTORY LTD., Defendant and Counterclaim Plaintiff.	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that Defendant and Counterclaim Plaintiff Wing Hon Manufactory Ltd. hereby files its proposed alternative Scheduling Order.

Respectfully submitted,

Dated: April 18, 2007

By: /s/ Barbara Wahl

Michael A. Grow (D.C. Bar No. 225383)
Barbara S. Wahl (D.C. Bar No. 297978)
ARENT FOX LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339
(202) 857-6000

Of Counsel:
Theodore R. Remaklus
WOOD HERRON & EVANS LLP
2700 Carew Tower
441 Vine Street
Cincinnati, OH 45202
(513) 241-2324

Counsel for Defendant and Counterclaim Plaintiff Wing Hon Metal Manufactory Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARTIER, a division of RICHEMONT NORTH AMERICA, INC., Plaintiff and Counterclaim Defendant, v. WING HON METAL MANUFACTORY LTD., Defendant and Counterclaim Plaintiff.	**Civil Action No. 06-1747 (RMC)**

[WING HON PROPOSED] SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 26(f), Local Civil Rule 16.3(d) and the Order for Initial Scheduling Conference, dated March 15, 2007 (D.I. 6), defendant and counterclaim plaintiff Wing Hon Metal Manufactory Ltd. hereby respectfully submits the following proposed scheduling order:

* * * Upon consideration of the Local Civil Rule 16.3(d) Report submitted by plaintiff and counterclaim defendant Cartier, a division of Richemont North America, Inc. ("Cartier") and defendant and counterclaim plaintiff Wing Hon Metal Manufactory Ltd. ("Wing Hon"), and the record in this case, the Court enters the following scheduling order this __ day of May, 2007:

(1) The parties are not required to exchange initial disclosures.

(2) Fact Discovery: Fact discovery, including answers to interrogatories, document production, requests for admissions, and depositions, shall be concluded by January 7, 2008.

(3) Joinder of Parties and Amendment of Pleadings: Other parties shall be joined and the pleadings shall be amended by no later than November 5, 2007.

(4) Expert Discovery: Expert discovery shall be concluded by April 7, 2008. Opening expert reports (on issues for which a party has the burden of proof) shall be due February 8, 2008, rebuttal expert reports shall be due March 7, 2008, and expert depositions shall be concluded by April 7, 2008.

(5) Claim Construction: The parties shall file a joint claim construction statement by August 31, 2007. Simultaneous opening claim construction briefs shall be filed by September 14, 2007. Simultaneous answering claim construction briefs shall be filed by October 5, 2007 (no reply claim construction briefs shall be filed). The Court will schedule oral argument on claim construction on a date to be determined by the Court

(6) Summary Judgment Motions: The parties shall file summary judgment motions (and opening briefs) by May 2, 2008. Answering briefs shall be filed by May 23, 2008, and reply briefs shall be filed by June 6, 2008. The Court will schedule oral argument on summary judgment motions on a date to be determined by the Court.

(7) Pre-Trial Conference: A pre-trial conference will be held in August, 2008, at a date to be determined by the Court.

(8) Jury Trial: The Court will set a firm start date and duration for a jury trial at the pretrial conference. Trial on the damages and willfulness issues shall be bifurcated from the infringement and validity issues.

SO ORDERED this __ day of May, 2007,

_____
Rosemary M. Collyer
United States District Judge

* * *

Respectfully submitted,

Dated: April 17, 2007

By: /s/ Barbara Wahl

Michael A. Grow (D.C. Bar No. 225383)
Barbara S. Wahl (D.C. Bar No. 297978)
ARENT FOX LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339
(202) 857-6000

Of Counsel:
Theodore R. Remaklus
WOOD HERRON & EVANS LLP
2700 Carew Tower
441 Vine Street
Cincinnati, OH 45202
(513) 241-2324

Counsel for Defendant and Counterclaim Plaintiff Wing Hon Metal Manufactory Ltd.