Exhibit A
Joint Proposed Case Schedule for *Memory Integrity* Litigations

Event	Agreed Upon Deadline	Plaintiff's Proposal	Defendants' Proposal
Rule 26(a) Initial Disclosures		October 6, 2014 Plaintiff proposes that disclosures pursuant to Paragraph 3 of the Delaware Default Standard should also be served by this date.	October 20, 2014
Plaintiff shall identify the accused product(s) and the asserted claim(s) each product allegedly infringes	October 13, 2014		
Each Defendant shall produce to the plaintiff the core technical documents related to the accused product(s)	December 8, 2014		
Plaintiff shall produce to each defendant a claim chart relating each accused product to the asserted claims each product allegedly infringes	February 2, 2015		
Each Defendant shall produce to the plaintiff its invalidity contentions for each asserted claim	March 4, 2015		
Motions to join other parties or amend pleadings	March 5, 2015		
Parties exchange list of claim terms they propose to be construed	March 18, 2015		
Parties exchange proposed claim constructions and	April 6, 2015		

supporting intrinsic and extrinsic evidence			
Document production substantially complete		April 9, 2015	Defendants do not believe Plaintiff's proposal should be adopted. Discovery should occur in its ordinary course during the litigation.
File Joint Claim Construction Chart	April 24, 2015		
Opening claim construction briefs	May 22, 2015		
Answering claim construction briefs	July 2, 2015		
Proposed *Markman* hearing		July 2015, or whenever is convenient for the Court "a total of 4 hours, with each side having 2 hours."	September 2015, or as the Court's schedule permits For the '121 patent: "a total of 4 hours, with each side having 2 hours." For the '636, '409, and '206 patents asserted against only Intel: "a total of 3 hours, with Plaintiff and Intel each having 1.5 hours."
Notice of reliance on advice of counsel		September 1, 2015	October 1, 2015
Last day to produce opinions of counsel upon which defendant may rely		September 15, 2015	October 15, 2015
Motions to amend pleadings to add inequitable conduct allegations		August 31, 2015	September 30, 2015
Fact discovery cutoff – all discovery must be served so as to be completed by this day	November 20, 2015		
Opening expert reports	January 29, 2016		

on issues for which a party bears the burden of proof			
Responsive expert reports	March 3, 2016		
Close of expert discovery	March 25, 2016		
Opening letters to Court regarding potential summary judgment motions	April 8, 2016		
Answering letters to Court regarding potential summary judgment motions	April 22, 2016		
Reply letters to Court regarding potential summary judgment motions	April 29, 2016		
Summary Judgment Motions	Within two weeks of the Court's decision permitting the filing of any such motions		
File joint proposed pretrial order (no motions *in limine* filed)	30 days before Pretrial conference		
Proposed Pretrial Conference	September 2016, or as the Court's schedule permits		
Proposed trial date for first trial	October 2016, or as the Court's schedule permits		