Proposed Case Schedule for *Takeda v. Par* (13-1524); *Takeda v. Amneal* (13-1729); *Takeda v. Watson* (14-268)

Event	Takeda's Proposal	Par and Amneal's Proposal	Watson's Proposal
Initial Disclosures			
Deadline for exchange of information identified at Rule 26(f) conference. (¶ 1(c)(1))	Completed	Completed	Completed
Deadline for identification of accused product(s), damages model, asserted patents, and production of file histories of each asserted patent. (¶ 1(c)(2))	Completed	Completed	10/2/2014
Deadline for defendant to produce the core technical documents related to the accused product. (¶ 1(c)(3))	Completed	Completed	Completed
Infringement/Invalidity Contentions			
Deadline for Plaintiff to produce an initial claim chart relating each known accused product to the asserted claims (¶ 1(c)(5))	10/16/2014	10/3/2014	10/16/2014
Deadline for Defendant to produce its initial invalidity contentions for each asserted claim. (¶ 1(c)(6))	11/17/2014	10/17/2014	11/17/2014
Deadline for parties to supplement the identification of accused products and of all invalidity references. (¶ 1(g))	4/17/2015	N/A	4/30/2015
Paper and Electronic Document Production			
Discovery of paper and electronic documents to be completed by (¶ 1(d)(2))	1/23/2015	Completed	1/23/2015
Joinder of Parties/Amendment of Pleadings			
Last day to file motions to join parties/amend the pleadings. (¶ 2)	3/20/2015	Completed	10/28/2014

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Event	Takeda's Proposal	Par and Amneal's Proposal	Watson's Proposal
Fact Discovery Deadline			
Fact Discovery to be completed by (¶ 1(a))	5/1/2015	1/23/2015	4/17/2015
Final Infringement/Invalidity Contentions			
Final infringement contentions due. (¶ 1(f)(2))	5/8/2015	2/23/2015	5/15/2015
Final invalidity contentions due. (¶ 1(f)(3))	5/8/2015	2/23/2015	5/15/2015
Claim Construction			
Exchange lists of claim terms in need of construction (not filed with the Court). (¶5(a))	12/19/2014	9/26/2014	12/5/2014
Supplemental exchange of claim terms in need of construction (not filed with the Court). (¶ 5(a))	1/16/2015	10/3/2014	12/19/2014
Joint Claim Construction Statement due (filed with the Court). (¶5(b))	2/6/2015	10/10/2014	1/9/2015
Opening Claim Construction Brief (Plaintiff) due. (¶5(c))	3/6/2015	10/24/2014	2/13/2015
Answering Claim Construction Brief (Defendants) due. (¶5(d))	4/3/2015	11/14/2014	3/13/2015
Plaintiff's reply claim construction brief due. (¶5(e))	4/24/2015	12/5/2014	4/3/2015
Defendants' surreply claim construction brief due. (¶5(f))	5/15/2015	12/26/2014	4/24/2015
Claim construction hearing	at the Court's convenience	1/16/2015 or at the Court's convenience	5/5/2015 or at the Court's convenience
Expert Discovery			
Expert reports due. (¶ 6(b))	7/24/2015	3/6/2015	7/2/2015

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Event	Takeda's Proposal	Par and Amneal's Proposal	Watson's Proposal
Expert rebuttal reports due. (¶ 6(b))	8/21/2015	4/3/2015	7/31/2015
Expert supplemental reports due. (¶ 6(b))	9/18/2015	4/24/2015	8/20/2015
Expert discovery to be completed by (¶ 6(a))	11/6/2015	6/5/2015	9/29/2015
Fact Witnesses to be Called at Trial			
Exchange list of fact witnesses each party intends to call at trial. (¶ 7 (as modified))	11/20/2015	6/8/2015	10/8/2015
Exchange list of rebuttal fact witnesses each party intends to call at trial. (¶ 7 (as modified))	12/18/2015	6/22/2015	10/23/2015
Last day to depose fact witnesses disclosed in exchange, not previously deposed in this case. (¶ 7 (as modified))	1/22/2016	7/10/2015	11/10/2015
Daubert Motions			
Daubert motions due. (¶ 6(d)(1))	N/A	6/12/2015	10/9/2015
Daubert reply briefs due. (¶ 6(d)(1))	N/A	6/26/2015	10/30/2015
Pre-Trial Conference and Trial			
Pre-trial Conference (¶ 11)	at the Court's convenience	7/21/2015	11/23/2015 or at the Court's convenience
Trial (¶ 12)	2/8/2016	8/03/2015	12/7/2015