UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

CASE NO.: 13-CV-60824-DIMITROULEAS/SNOW

VALEDA COMPANY LLC
(d/b/a Q'STRAINT), a Delaware
Limited Liability Company,

Plaintiff,

v.

AMERICAN SEATING COMPANY, a
Delaware corporation,

Defendant.

JOINT PROPOSED SCHEDULING ORDER

THIS CAUSE is before the Court upon receipt of the parties' Joint Scheduling Report. It is thereupon **ORDERED AND ADJUDGED** as follows:

A. Pursuant to Rule 16.1 of the Local Rules of the U.S. District Court for the Southern District of Florida, this case shall be assigned to the **Complex Case Management Track**.

B. All discovery in this case shall be completed as set forth below:

Initial Disclosures of Both Parties (LPR[1] 2.1)	**6/27/2013**
Initial Infringement Contentions (LPR 2.2)	**7/11/2013**

[1] "LPR" refers to the Proposed Local Patent Rules of the Middle District of Florida. As explained in the parties' Joint Discovery Plan and Scheduling Report, the parties have adopted the content requirements, sequence and timing of events as set forth in Proposed Local Patent Rules of the Middle District of Florida. *See http://www.ipcommittee.com/wp-content/uploads/2009/06/proposedlocalpatentrules.pdf.*

Initial Non-Infringement and Invalidity Contentions (LPR 2.3)	**7/25/2013**
Initial Response To Invalidity Contentions (LPR 2.5)	**8/8/2013**
Final Infringement Contentions (LPR 3.1)	**10/21/2013**
Final Invalidity Contentions (LPR 3.2)	**11/18/2013**
Opening Claim Construction Brief (LPR 4.2(a))	**12/30/2013**
Responsive Claim Construction Brief (LPR 4.2(c))	**1/27/2014**
Reply Claim Construction Brief (LPR 4.2(d))	**2/10/2014**
Joint Claim Construction Chart (LPR 4.2(e))	**2/17/2014**
Claim Construction Hearing (LPR 4.3)	**3/3/2014**
Claim Construction Ruling	**3/3/31/14**
Close of Fact Discovery After Claim Construction Ruling	**5/12/2014**
Expert Reports of Parties with Burden of Proof (LPR 5.1(b))	**6/2/2014**
Rebuttal Expert Reports (LPR 5.1)	**7/7/2014**
Completion of Expert Witness Depositions (LPR 5.2)	**8/11/2014**

C. The Parties have not reached an agreement regarding the preservation, disclosure, and discovery of documents, electronically stored information or things. The Parties will work together to facilitate agreements on these issues.

D. The Parties have not reached an agreement for asserting claims of privilege or protection of trial preparation materials after production. The Parties will work together to facilitate agreements on these issues.

E. The Parties' proposal for the time to join additional parties and to amend

the pleadings is **November 18, 2013.**

F. All pretrial motions shall be filed by _____, 2014.

G. All pretrial motions shall be resolved by the Court by _____, 2014.

H. Use of the Manual on Complex Litigation is not necessary in this case. The presumptive limit of ten (10) depositions per side, Fed. R. Civ. P. 30(a)(2)(A)(i), is increased to fifteen (15) depositions per side.

I. A pretrial conference shall be held on _____, 2014.

J. The trial of this matter shall begin _____, 2014.

DONE AND ORDERED in chambers at Fort Lauderdale, Broward County, Florida, on this _____ day of _____, 2013.

_____
WILLIAM P. DIMITROULEAS
UNITED STATES DISTRICT JUDGE

cc: All Counsel of Record

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