IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

MITSUBISHI ELECTRIC CORP. (alternatively named MITSUBISHI DENKI KABUSHIKI KAISHA), KONINKLIJKE PHILIPS N.V, THOMSON LICENSING, GE TECHNOLOGY DEVELOPMENT, INC., PANASONIC CORPORATION, and SONY CORPORATION, *Plaintiffs*, v. CRAIG ELECTRONICS INC., *Defendant*.	Civil Action No. 9:13-cv-80738-DMM JURY TRIAL DEMANDED
MITSUBISHI ELECTRIC CORP. (alternatively named MITSUBISHI DENKI KABUSHIKI KAISHA), KONINKLIJKE PHILIPS N.V., THOMSON LICENSING, GE TECHNOLOGY DEVELOPMENT, INC., PANASONIC CORPORATION, and SONY CORPORATION, *Plaintiffs*, v. CURTIS INTERNATIONAL LTD., *Defendant*.	Civil Action No. 9:13-cv-80739-DMM JURY TRIAL DEMANDED
MITSUBISHI ELECTRIC CORP. (alternatively named MITSUBISHI DENKI KABUSHIKI KAISHA), KONINKLIJKE PHILIPS N.V, THOMSON LICENSING, GE TECHNOLOGY DEVELOPMENT, INC., PANASONIC CORPORATION, and SONY CORPORATION, *Plaintiffs*, v. VIEWSONIC CORPORATION (alternatively named VIEWSONIC DISPLAY CO.), *Defendant*.	Civil Action No. 9:13-cv-80743-DMM JURY TRIAL DEMANDED

Civil Action No. 9:13-cv-80738-DMM
Civil Action No. 9:13-cv-80739-DMM
Civil Action No. 9:13-cv-80743-DMM
Civil Action No. 9:13-cv-80745-DMM

MITSUBISHI ELECTRIC CORP. (alternatively named MITSUBISHI DENKI KABUSHIKI KAISHA), KONINKLIJKE PHILIPS N.V., and THOMSON LICENSING,

Plaintiffs,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Civil Action No. 9:13-cv-80745-DMM

JURY TRIAL DEMANDED

JOINT SCHEDULING REPORT AND PROPOSED SCHEDULING ORDER

Plaintiffs Mitsubishi Electric Corp. (alternatively named Mitsubishi Denki Kabushiki Kaisha), Koninklijke Philips N.V., Thomson Licensing, GE Technology Development, Inc., Panasonic Corporation and Sony Corporation ("Plaintiffs"), and Defendants Craig Electronics Inc., Curtis International Ltd., ViewSonic Corporation and Motorola Mobility LLC ("Defendants") (together, "the Parties"), pursuant to S.D. Fla. L.R. 16.1(b), hereby submit this Joint Scheduling Report and Proposed Scheduling Order.

1. Consolidation for pretrial purposes: The Parties agree that these actions should be consolidation for pretrial purposes, and that all proceedings should be coordinated before this Court.

ViewSonic Corporation ("ViewSonic") contends that all proceedings in the case Mitsubishi Electric Corp., et al. v. ViewSonic Corp., Case No. 9:13-cv-80743-DMM (S.D. Fla.), including pretrial proceedings, should be transferred to the Central District of California.

Curtis International Ltd. ("Curtis") contends that all proceedings in the case Mitsubishi Electric Corp., et al. v. Curtis International Ltd., Case No. 9:13-cv-80739-DMM (S.D. Fla.), including pretrial proceedings, should be transferred to the Central District of California.

2. Likelihood of Settlement: The Parties have undertaken good faith discussions about the possible settlement of these actions, but no agreement has yet been reached. The Parties will continue good faith settlement discussions but are unable to determine the likelihood of settlement at this stage.

3. Likelihood of Additional Parties: The Parties agree that, pending discovery, the likelihood of appearance in these actions of additional parties is undetermined at this time.

4. Proposed Limits on Time: The Parties submit herewith a Joint Proposed Scheduling Order, setting forth proposed time limits. *See* Exhibit 1 attached hereto.[1]

5. Proposals for the Formulation and Simplification of Issues: The Parties agree to work together to simplify the issues and eliminate claims or defenses that, through discovery, are without evidentiary basis.

6. The Necessity or Desirability of Amendments to the Pleadings: The Parties do not anticipate needing to amend their pleadings at this stage, unless necessitated by discovery or court ruling.

7. Possibility of Obtaining Admissions of Fact, Stipulations and Advance Rulings on Evidence: The Parties shall attempt, through stipulations and admissions of facts, witnesses, and authenticity of documents, to streamline evidentiary matters before the Court and avoid unnecessary disputes and use of cumulative evidence. The Parties will work cooperatively to

[1] Curtis is seeking an extension of time in which to answer the Complaint in its case from the current date of September 24, 2013, to October 6, 2013. Plaintiffs do not oppose Curtis's request. The extension is not sought for the purpose of delay and will not affect the proposed schedule.

narrow and identify any areas of dispute on evidentiary matters anticipated at trial and to present such disputes, to the extent possible, in pre-trial motions *in limine*.

8. Avoidance of Unnecessary Proof and Cumulative Evidence: The Parties have discussed the possibility of obtaining admissions of fact and of documentary evidence, stipulations regarding authenticity of documents, efforts to avoid unnecessary proof and cumulative evidence, and agree to make their best efforts to cooperate on such admissions, stipulations, or other suggestions for the avoidance of unnecessary proof or cumulative evidence.

9. Advisability of Referring Matters to Magistrate Judge: The Court has referred these matters to the Hon. Dave Lee Brannon for determination of discovery motions. The Parties do not consent to the use of the magistrate judge for dispositive motions or for trial.

10. Preliminary Estimate of Time Required For Trial: The Parties estimate that the trial in each of the consolidated actions will require 7-10 days.

11. Final Pretrial Conference: The Parties believe that a pretrial conference two weeks before each trial would be helpful to address pretrial matters and help the parties narrow and focus the issues for trial.

12. Any Other Information That Might Be Helpful To The Court In Setting The Case For Status Or Pretrial Conference: The Parties have agreed to work together on managing e-discovery and intend to submit a proposed Stipulated Protective Order for the Court's consideration, which the Parties hope will facilitate the exchange of confidential information in discovery. The Parties will submit an agreed motion requesting entry of such an order, but to the extent the Parties do not agree on particular issues or provisions in the protective order, the Parties will file an appropriate motion identifying each party's position on the disputed issues.

At this time, the Parties have no additional information that might be helpful to the Court, but will submit such information as it becomes known through discovery.

Dated: September 19, 2013

Respectfully submitted,

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application for admission pro hac vice to be filed

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Certificate of Service

I hereby certify that on this 19th day of September, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system.

/s/ *Payal Salsburg*