

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AQUA CONNECT, INC. a Nevada corporation,
and STRATEGIC TECHNOLOGY PARTNERS,
LLC, a Nevada limited liability company,

Plaintiffs,

v.

TEAMVIEWER US, INC.,

Defendant.

C.A. No. 18-01572-MN

LEAD CASE

AQUA CONNECT, INC., a Nevada corporation,
and STRATEGIC TECHNOLOGY PARTNERS,
LLC, a Nevada limited liability company,

Plaintiffs,

v.

TEAMVIEWER GERMANY GMBH,

Defendant.

C.A. No. 19-2286-MN

STIPULATION AND ORDER TO EXTEND TIME

Plaintiffs Aqua Connect, Inc. and Strategic Technology Partners, LLC (collectively, “Aqua” or “Plaintiffs”) and defendants TeamViewer US, Inc. and TeamViewer Germany GmbH (collectively, “TeamViewer” or “Defendants”) submit this Joint Status Report and Stipulation and Order to Extend time in the above-referenced consolidated cases.

WHEREAS, the global outbreak of the Coronavirus Disease 2019 (COVID-19) has continued to impact the ability of the parties to undertake in-person depositions in Germany and otherwise meet the current deadlines;

WHEREAS, due to ongoing COVID-19 restrictions, the U.S. Consulate General in Frankfurt is currently unable to schedule depositions;

WHEREAS, counsel for the parties are continuing to consider how to move the case forward during this period of continued closures and international travel limitations; and

WHEREAS, the parties believe it is necessary to move the current schedule back approximately 90 days to accommodate the discovery needed and subsequent deadlines.

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff Aqua Connect Inc. and Strategic Technology Partners, LLC and Defendants TeamViewer US, Inc. and TeamViewer Germany GmbH, subject to the approval of the Court, that the following deadlines are extended as follows:

Deadline	Current Date	New Date
Deadline to complete all fact witness depositions	June 16, 2021	September 16, 2021
Deadline for Aqua to narrow the asserted claims to no more than five claims per asserted patent, and no more than a total of eight claims	June 21, 2021	September 21, 2021
Deadline to file discovery related motions	June 22, 2021	September 22, 2021
Disclosure of Initial Expert Reports for the party who has the initial burden of proof	July 23, 2021	October 22, 2021

Deadline for TeamViewer to narrow the asserted prior art references no more than six asserted prior art references per patent from among the prior art references previously identified for that particular patent, and no more than a total of 10 references	July 23, 2021	October 25, 2021
Rebuttal Expert Reports	August 24, 2021	December 3, 2021
Reply Expert Reports from party with the initial burden of proof	September 16, 2021	December 17, 2021
Deadline to file letter briefs seeking permission to file case dispositive motions	October 15, 2021	January 14, 2022
Deadline to take expert depositions	October 22, 2021	January 21, 2022
Deadline to file answering letter briefs regarding permission to file case dispositive motions	October 29, 2021	January 28, 2022
Deadline to file Case Dispositive Motions and <i>Daubert</i> Motions	November 5, 2021	February 4, 2022
Deadline to file Oppositions to Case Dispositive Motions and <i>Daubert</i> Motions	December 1, 2021	March 1, 2022
Deadline to file Replies to Case Dispositive Motions and <i>Daubert</i> Motions	December 21, 2021	March 21, 2022
Pretrial Conference	March 3, 2022	August 1, 2022 at 1:00 p.m.
Trial (5-day Jury)	March 14, 2022	August 8, 2022

Dated: June 18, 2021

STAMOULIS & WEINBLATT LLC

/s/ Stamatios Stamoulois

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IT IS SO ORDERED this day of June 2021.


The Honorable Maryellen Noreika
United States District Judge