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Attorneys for Defendant
TELA INNOVATIONS, INC.

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

INTEL CORPORATION,)
)
Plaintiff,)
)
v.)
)
TELA INNOVATIONS, INC.,)
)
Defendant.)

CASE NO. 18-cv-02848-WHO

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND CERTAIN
DATES IN CASE SCHEDULE**

Judge: Hon. William H. Orrick

1 The parties respectfully file this stipulation and proposed order to extend certain dates in the
2 Court's Order Regarding Case Schedule (Dkt. No. 77).

3 The parties stipulate to an extension of the deadline to complete expert discovery from May
4 15, 2020 to July 3, 2020 due to the COVID-19 pandemic. The parties further stipulate to an extension
5 of the deadlines for briefing on dispositive motions to accommodate the stipulated extension of the
6 deadline to complete expert discovery, with the deadline to file opening dispositive motions extended
7 from June 5, 2020 to July 17, 2020, and the dates for responsive and reply dispositive motions adjusted
8 accordingly, as noted in Exhibit A.

9 The parties further stipulate to and request that the hearing on summary judgment motions,
10 currently scheduled for August 12, 2020, be moved to September 9, 2020 because counsel for Tela,
11 including lead counsel, is unavailable due to a trial scheduled for August 5-18, 2020, and further to
12 accommodate the proposed extension of the summary judgment briefing schedule noted above.

13 The parties further stipulate to and request that the hearing on *Daubert* Motions and Motions
14 to Strike, currently scheduled for September 23, 2020, be moved to October 14, 2020, due to the
15 Court's unavailability from September 18 - October 2, 2020 per the Court's calendar notes. The parties
16 also stipulate to and request that the briefing schedule for *Daubert* Motion and Motions to Strike be
17 extended, with the deadline to file opening briefs extended from August 14, 2020 to September 4,
18 2020, and the dates for responsive and reply briefs be adjusted accordingly, as noted in Exhibit A.

19 The parties have not previously sought extensions of any of the above deadlines and no other
20 dates in the calendar are affected by this requested change. The parties hereby stipulate, subject to
21 the Court's approval, to the proposed extensions to the case schedule attached as Exhibit A and request
22 entry of this modified case schedule.

23
24 **IT IS SO STIPULATED**, through Counsel of Record.

1 DATED: May 12, 2020

2 Respectfully submitted,

3 By: /s/ Todd M. Friedman

By: /s/ Gregory S. Bishop

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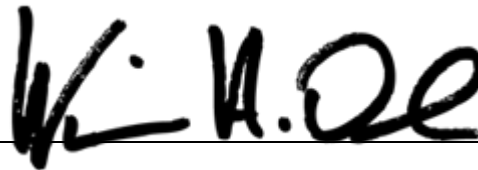
Exhibit A - Modified Case Schedule

Deadline	Current Date	Modified Date
Deadline to complete expert discovery	Friday May 15, 2020	Friday July 3, 2020
Deadline to file dispositive motions (Civ. L.R. 7-2(a), at least 35 days before hearing)	Friday June 5, 2020	Friday July 17, 2020
Deadline to file responsive dispositive motion briefs	Friday June 26, 2020	Friday August 7, 2020
Deadline to file reply dispositive motion briefs	Friday July 10, 2020	Friday August 21, 2020
Hearing on summary judgment motions	Wednesday August 12, 2020	Wednesday September 9, 2020 (Subject to the Court's availability)
Deadline to file opening briefs for Daubert Motions and Motions to Strike	Friday August 14, 2020	Friday September 4, 2020
Deadline to file responsive briefs for Daubert Motions and Motions to Strike	Friday August 28, 2020	Friday September 18, 2020
Deadline to file reply briefs for Daubert Motions and Motions to Strike	Friday September 4, 2020	Friday September 25, 2020
Hearing on Daubert Motions and Motions to Strike	Wednesday September 23, 2020 (Subject to the Court's availability)	Wednesday October 14, 2020 (Subject to the Court's availability)
Deadline to serve pretrial disclosures (witness list, deposition designations, and Exhibit List)	Friday October 9, 2020	No change

Deadline	Current Date	Modified Date
Deadline to serve objections to pretrial disclosures	Friday October 23, 2020	No change
Lead counsel meet and confer re settlement, preparation of the Joint Pretrial Statement and order, preparation and exchange of pretrial materials, and clarification and narrowing of contested issues	Friday October 30, 2020	No change
Deadline to file Motions <i>in Limine</i>	Friday November 6, 2020	No change
Deadline to file responses to Motions <i>in Limine</i>	Friday November 20, 2020	No change
Deadline to file Pretrial Filings (Joint Pretrial Statement, Trial Briefs, Compiled Briefing on Motions <i>in Limine</i> , Proposed Jury Instructions, Proposed Verdict Form, Proposed <i>Voir Dire</i> Questions, Witness List, and Exhibit List)	Friday December 4, 2020	No change
Final pretrial conference	Monday December 21, 2020 at 2:00 pm	No change
Trial Date	Monday, March 1, 2021	No change

1 **IT IS ORDERED** that the forgoing Stipulation and Modified Case Schedule is approved, **except**
2 **that the hearing on the motions for summary judgment shall be heard on September 30, 2020**
3 **at 2:00 p.m. and the hearing on the Daubert motions and motions to strike shall be heard on**
4 **October 28, 2020 at 2:00 p.m.**

5 Dated: May 14, 2020



6 Honorable William H. Orrick

7 UNITED STATES DISTRICT JUDGE

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatories.

Respectfully submitted,

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