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July 3, 2018

VIA ECF

Hon. Karen M. Williams
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza
4th and Cooper Streets
Camden, New Jersey 08101

Re: *Genentech, Inc. et al. v. Sandoz, Inc. et al.*, No. 17-cv-13507 (RMB/KMW)

Dear Judge Williams:

This firm, together with Irell & Manella LLP, represents plaintiffs Genentech, Inc., Biogen, Inc., and City of Hope in the above-referenced matter.

On March 8, 2018, this Court conducted an Initial Scheduling Conference in this matter. At that conference, and pursuant to the parties' Joint Proposed Discovery Plan (submitted via email on March 1, 2018), it was agreed that the parties would defer local patent rule disclosures and subsequent deadlines pending a decision on the then-anticipated preliminary injunction motion.

Following several conferences and hearings before Judge Bumb, the timing of that motion was deferred. *See, e.g.*, Dkt. Nos. 41, 45, & 52. Desiring to proceed with this action pursuant to the procedures outlined in the local patent rules, the parties have conferred and respectfully request that the Court enter the proposed case schedule that is set forth on Attachment A to this letter.

Respectfully,

s/Keith J. Miller

Keith J. Miller

cc: All Counsel of Record (w/e) (via CM/ECF)

Attachment A

Joint Proposed Schedule
Genentech, Inc., et al. v. Sandoz, Inc., et al., Case No. 17-cv-13507 (RMB/KMW)

Event	Local Patent Rule(s)	Proposed Date
Disclosure of Asserted Claims & Infringement Contentions/Initial Production	3.1 & 3.2	7/31/2018
Non-Infringement Contentions and Responses/Invalidity Contentions/Initial Production	3.2A, 3.3, & 3.4	9/14/2018
Responses to Invalidity Contentions	3.4A	9/28/2018
Exchange of Proposed Terms for Construction	4.1	10/12/2018
Exchange of Preliminary Claim Constructions & Extrinsic/Intrinsic Evidence (own constructions)	4.2(a)-(b)	11/2/2018
Exchange of Intrinsic & Extrinsic Evidence (other party's constructions)	4.2(c)	11/16/2018
Joint Claim Construction & Prehearing Statement	4.3	12/3/2018
Opening <i>Markman</i> Submissions	4.5(a)	1/17/2019
Close of Claim Construction Expert Discovery	4.5(b) ¹	3/4/2019
Responsive <i>Markman</i> Submissions	4.5(c)	4/2/2019
Propose <i>Markman</i> Hearing	4.6	4/16/2019
Close of Fact Discovery		90 days after <i>Markman</i> decision.
Opening Expert Reports (for party bearing the burden of proof)		60 days after close of fact discovery.
Rebuttal Expert Reports		60 days after opening reports.
Reply Expert Reports		30 days after rebuttal reports.
Close of Expert Discovery		60 days after reply reports.

¹ Modified to 45 days after LPR 4.5(a) submissions by party agreement.