

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
CALIFORNIA

Carbon Autonomous Robotic Systems Inc. v. Laudando & Associates  
LLC

No. 2:24-cv-03012-DAD-JDP (E.D. Cal. Apr. 8, 2025) · No. 2:24-cv-03012-DAD-JDP · Decided April 9, 2025

SUMMARY

The United States District Court for the Eastern District of California overruled Carbon Autonomous Robotic Systems Inc.’s objections to the scheduling order. The court declined to modify the order’s adoption of the Northern District of California’s Patent Local Rules, including provisions concerning infringement contentions, technical discovery, and expert claim-construction declarations.

CASE DETAILS

|                       |                                                                                                                                                                                                        |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of California                                                                                                                                    |
| WRITING FOR THE COURT | Dale A. Drozd                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the Eastern District of California                                                                                                                                    |
| DECIDED               | April 9, 2025                                                                                                                                                                                          |
| DOCKET                | 2:24-cv-03012-DAD-JDP                                                                                                                                                                                  |
| DISPOSITION           | other                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | The court considered plaintiff and counter-defendant's objections to the court's scheduling order in a patent infringement action.                                                                     |
| STANDARD OF REVIEW    | Good cause is required to modify the scheduling order and to amend infringement contentions under Patent Local Rule 3-6; the court also exercised its discretion in managing discovery and scheduling. |
| PRECEDENTIAL VALUE    | unpublished district court order                                                                                                                                                                       |
| PARTIES               | Carbon Autonomous Robotic Systems Inc. v. Laudando & Associates LLC                                                                                                                                    |

TOPICS

- patent law
- discovery dispute
- civil procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the scheduling order should be modified to establish final infringement, invalidity, and noninfringement contention deadlines and permit amendment of initial contentions as a matter of course until those deadlines.
2. Whether the scheduling order should require defendant to produce core technical documents and source code before plaintiff serves its initial infringement contentions.
3. Whether the scheduling order should delay the exchange of expert claim-construction declarations until after the Joint Claim Construction and Prehearing Statement.

## HOLDINGS

1. The court denied the requested modification because plaintiff did not establish good cause, and the Patent Local Rules' requirement that amendments be filed diligently was consistent with early crystallization of the parties' infringement and invalidity theories.
2. The court denied plaintiff's request to impose a specific incremental discovery deadline for production of core technical documents and source code.
3. The court denied plaintiff's request to delay the exchange of expert claim-construction declarations because Patent Local Rule 4-2 appropriately requires their exchange with the Joint Claim Construction and Prehearing Statement.

## KEY QUOTATIONS

*“The Northern District’s Patent Local Rules are “designed specifically to ‘require parties to crystallize their theories of the case early in the litigation’ so as to ‘prevent the ‘shifting sands’ approach to claim construction.’””* (at 1-2)

*“But we see nothing in the Federal Rules that is inconsistent with local rules requiring the early disclosure of infringement and invalidity contentions and requiring amendments to contentions to be filed with diligence.”* (at 2)

## FACTUAL BACKGROUND

The court's scheduling order adopted the Northern District of California's Patent Local Rules for the parties' patent litigation. Plaintiff sought to establish later final contention deadlines, permit amendment of contentions as a matter of course, require early production of core technical documents and source code, and delay the exchange of expert claim-construction declarations. The court found no good cause to modify the order and concluded that the existing rules appropriately promote early disclosure and prevent shifting claim-construction positions.

## PROCEDURAL HISTORY

The court issued a scheduling order on February 26, 2025, adopting the Northern District of California's Patent Local Rules. Carbon Autonomous Robotic Systems Inc. filed objections on March 12, 2025, seeking modifications concerning contention deadlines, early production of technical documents and source code, and the timing of expert claim-construction declarations. The court overruled the objections and left the scheduling order in place.

## DISPOSITION

other

## CASES CITED

- O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Co., 521 F.3d 1351, 1364, 1366 (Fed. Cir. 2008)
- MediaTek Inc. v. Freescale Semiconductor, Inc., No. 11-cv-5341-YGR, 2014 WL 971765, at \*3 (N.D. Cal. Mar. 5, 2014)
- Linex Techs. v. Hewlett-Packard Co., No. 13-cv-00159-CW, 2013 WL 5955548, at \*2 (N.D. Cal. Nov. 6, 2013)
- Broadcom Corp. v. Qualcomm Inc., No. 05-cv-00467-JVS-RNB, 2006 WL 8441691, at \*3 (C.D. Cal. Dec. 5, 2006)
- Comcast Cable Commc'ns v. Finisar Corp., No. 06-cv-04206-WHA, 2007 WL 716131 (N.D. Cal. Mar. 2, 2007)
- HTC Corp. v. Tech. Props. Ltd., No. 5:08-cv-00882-JF-HRL, 2010 WL 4973628, at \*2 (N.D. Cal. Dec. 1, 2010)