

1 Gregory Dovel (SBN 135387)
 2 Email: greg@dovel.com
 Richard Lyon (SBN 229288)
 3 Email: rick@dovel.com
 4 DOVEL & LUNER, LLP
 201 Santa Monica Blvd., Suite 600
 5 Santa Monica, CA 90401
 6 Telephone: 1.310.656.7066
 Attorneys for Plaintiff
 7 NETWORK-1 TECHNOLOGIES, INC.

8 Alexis Adian Smith (SBN 274429)
 9 asmith@jonesday.com
 10 JONES DAY
 555 South Flower Street
 11 Fiftieth Floor
 12 Los Angeles, CA 90071
 Telephone: +1.213.489.3939
 13 Facsimile: +1.213.243.2539
 14 Attorneys for Defendant
 15 HIKVISION USA, INC.

16 UNITED STATES DISTRICT COURT
 17 CENTRAL DISTRICT OF CALIFORNIA

19 NETWORK-1 TECHNOLOGIES,
 20 INC.,
 21 Plaintiff,
 22 v.
 23 HIKVISION USA, INC.,
 24 Defendant.

Case No. 2:22-CV-08050 CJC(JDEx)

**JOINT AND UNOPPOSED
 MOTION TO CONTINUE THE
 HEARING ON DEFENDANT'S
 PARTIAL MOTION TO DISMISS
 AND CORRESPONDING REPLY
 BRIEF, AND THE DATE TO ISSUE
 A SCHEDULING ORDER**

Judge: Hon. Cormac J. Carney

1 The parties to this action hereby request that the Court continue for three
2 weeks (a) the hearing for Defendant’s Partial Motion to Dismiss and the date for
3 Defendant to file its corresponding Reply Brief, and (b) the date to issue a
4 Scheduling Order and the corresponding dates for an early meeting of counsel and
5 filing a report.

6 Defendant Hikvision filed a Notice of Motion and Partial Motion to Dismiss
7 Under Federal Rule of Civil Procedure 12(b)(6). Dkt. 27. Pursuant to the Court’s
8 Order (Dkt. 33), the hearing on Defendant’s Motion was continued and is currently
9 scheduled for June 26, 2023. Defendant’s Reply brief is currently due June 12,
10 2023. The parties request that the hearing be continued to July 17, 2023, and that
11 the deadline for Defendant to submit its Reply brief be continued to July 3, 2023.

12 The Court provided notice that it intends to issue a Scheduling Order on July
13 6, 2023, and that the parties hold an early meeting of counsel not later than 21 days
14 in advance of that date and to file a report of such meeting not later than 14 days
15 thereafter. Dkt. 28. The parties request that the date to issue a Scheduling Order be
16 continued to July 27, 2023, with the corresponding deadlines for the early meeting
17 of counsel and a report to be adjusted accordingly.

18 The parties reached a settlement and are in the process of documenting the
19 settlement. The parties request a three-week continuance for each of these dates to
20 finalize documenting the terms of the settlement. Good cause exists for this
21 extension. Granting this extension will conserve party and Court resources. *See*
22 Declaration of Richard Lyon.

23
24
25
26

1 Dated: June 8, 2023

Respectfully submitted,
DOVEL & LUNER, LLP

2

3

4

By: /s/ Richard Lyon
Richard Lyon

5

6

Attorney for Plaintiff
NETWORK-1 TECHNOLOGIES, INC.

7 Dated: June 8, 2023

Respectfully submitted,
JONES DAY

8

9

10

By: /s/ Alexis Adian Smith
Alexis Adian Smith

11

12

Attorney for Defendant
HIKVISION USA, INC.

13

14

ATTESTATION

15

In accordance with Local Rule 5-4.3.4(a)(2), I attest that concurrence in the filing of this document has been obtained from all other signatories listed and on whose behalf this filing is submitted.

16

17

18

19

/s/ Richard Lyon
Richard Lyon

20

21

22

23

24

25

26