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*Mobile Communication Co., Ltd., and*  
*Shenzhen TCL Creative Cloud*  
*Technology Co., Ltd.*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ANCORA TECHNOLOGIES,  
16 INC.

17 Plaintiff,

18 v.

19 TCT MOBILE (US) INC.,  
HUIZHOU TCL MOBILE  
COMMUNICATION CO.,  
LTD., and SHENZHEN TCL  
20 CREATIVE CLOUD  
TECHNOLOGY CO., LTD.,

21 Defendants.  
22

**Case No. 8:19-cv-02192-GW-ASx**  
**(LEAD CASE)**

Consolidated Case No.:  
Case No. 2:20-cv-01252-GW-ASx

[Hon. George H. Wu]

**NOTICE OF MOTION AND JOINT**  
**MOTION TO STAY**

1 Plaintiff Ancora Technologies, Inc. (“Ancora”) and defendants TCT Mobile  
2 (US) Inc., Huizhou TCL Mobile Communications Co., Ltd., and Shenzhen TCL  
3 Creative Cloud Technology Co., Ltd. (collectively “TCL”) respectfully request a  
4 stay of all deadlines in this case. In support of this Motion, Ancora and TCL  
5 (plaintiff and defendants collectively the “Parties”) state as follows:

6 1. The Parties have been engaged in litigation involving U.S. Patent No.  
7 6,411,941 (“Patent-in-Suit”).

8 2. The Parties have been engaged in settlement discussions for several  
9 weeks as the magnitude of the dispute between the parties does not  
10 justify the fees and costs associated with further litigating this matter.

11 3. Recently, the Parties entered into a written Settlement Agreement.

12 4. The Parties now seek the present stay of all deadlines in this matter  
13 while the parties finalize their performance under the Settlement  
14 Agreement.

15 5. The parties anticipate that the requested stay will last no more than 90  
16 days.

17 6. When the parties finalize performance under the Agreement, the Parties  
18 anticipate submitting a stipulated dismissal of all claims.

19 WHEREFORE, Plaintiff Ancora Technologies, Inc. and Defendants TCT  
20 Mobile (US) Inc., Huizhou TCL Mobile Communications Co., Ltd., and Shenzhen  
21 TCL Creative Cloud Technology Co., Ltd. respectfully request that all deadlines in  
22 this matter be stayed.  
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24

1 Date: February 22, 2021

**BROOKS KUSHMAN P.C.**

*/s/ Marc Lorelli\*\**

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23 \*\* Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Plaintiffs'  
24 counsel concurs in the content of this Joint Motion to Stay Proceedings and has  
authorized its filing with his electronic signature.