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19 Attorneys for Defendant
 20 AGIS SOFTWARE DEVELOPMENT LLC

21 UNITED STATES DISTRICT COURT
 22 NORTHERN DISTRICT OF CALIFORNIA
 23 OAKLAND DIVISION

24 Case No. 18-cv-06185-HSG

25 ZTE (USA) INC.,
 26
 27 Plaintiff,

**NOTICE REGARDING CONTINUATION
 OF HEARING ON DEFENDANT'S MOTION
 FOR SANCTIONS (L.R. 7-7(a))**

28 v.

AGIS SOFTWARE DEVELOPMENT LLC, et
 al.

Initial Hearing Date: May 9, 2019
 Updated Hearing Date: June 6, 2019
 Time: 2:00 p.m. PST
 Trial Date: None set

Defendants.

1 Pursuant to Local Rule 7-7(a), Defendant AGIS Software Development LLC (“AGIS
2 Software” or “Defendant”), by and through its counsel of record, hereby continues the hearing on
3 Defendant’s Motion for Sanctions (Dkt. 48) from May 9, 2019 to **June 6, 2019**, at 2:00 p.m. PT:

4 **WHEREAS**, on February 20, 2019, AGIS Software served via email and overnight mail to
5 counsel for Plaintiff ZTE (USA) Inc. (“ZTE”): (1) Defendant’s Notice of Motion and Motion for
6 Sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure (“Rule 11”), and all
7 accompanying declarations and exhibits (the “Motion”); and (2) correspondence attaching the
8 Motion, explaining that, as further set forth in the Motion, ZTE’s Second Amended Complaint
9 (“SAC”) asserts claims of personal jurisdiction that lack a legal or factual basis, in violation of Rule
10 11(b), and requesting that ZTE’s counsel withdraw the SAC within the 21 day period set by Rule
11 11(c) to avoid the filing of the Motion;

12 **WHEREAS**, the Motion set a hearing date of May 9, 2019, the earliest available hearing
13 date on the Court’s calendar as of February 20, 2019, the date the Motion was signed and served on
14 ZTE’s counsel;

15 **WHEREAS**, on March 13, 2019, counsel for ZTE sent AGIS Software’s counsel a letter
16 response indicating that ZTE would not withdraw the SAC;

17 **WHEREAS**, the 21 day period set forth in Rule 11(c) expired on March 13, 2019;

18 **WHEREAS**, on March 15, 2019, AGIS Software filed the Motion, in compliance with Rule
19 11(c) (Dkt. 48);

20 **WHEREAS**, as of March 15, 2019, the Court’s calendar indicated that the Court was no
21 longer available for hearing on May 9, 2019, and that the earliest available hearing date was June 6,
22 2019;

23 **WHEREAS**, in accordance with Local Rule 7-7(a), no opposition has been filed to the
24 Motion, and this Notice is being filed prior to ZTE’s deadline to file an opposition to the Motion,
25 which is not until March 29, 2019;

26

1 **NOW, THEREFORE**, pursuant to Local Rule 7-7(a), AGIS Software hereby continues the
2 hearing on the Motion (Dkt. 48) from May 9, 2019 to **June 6, 2019**, at 2:00 p.m. PT.

3
4 Date: March 15, 2019

Respectfully submitted,

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7
8 By: /s/ Peter Lambrianakos

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