

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

Before the Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of)

**CERTAIN DIGITAL CABLE AND)
SATELLITE PRODUCTS, SET-TOP)
BOXES, GATEWAYS, AND)
COMPONENTS THEREOF)**

Investigation No. 337-TA-1049

**JOINT MOTION TO EXTEND CERTAIN DEADLINES IN THE PROCEDURAL
SCHEDULE**

Pursuant to Ground Rules 1.9 and 2, Complainants Sony Corporation and Sony Electronics Inc. (collectively “Complainants” or “Sony”) and Respondents ARRIS International plc, ARRIS Group, Inc., ARRIS Technology, Inc., ARRIS Enterprises, LLC, ARRIS Solutions, Inc., ARRIS Global Ltd., Pace Americas, LLC, Pace Americas Holdings, Inc., Pace USA LLC, and Pace Americas Investments, LLC’s (collectively “Respondents” or “ARRIS”) (collectively, the “Private Parties”) hereby respectfully move for an extension of certain deadlines in the Procedural Schedule (Order No. 5). Staff does not oppose this motion.

Specifically, the Parties request the following: (1) the deadline for the disclosure of final invalidity contentions be extended 10 days from Monday, August 14, 2017 to Thursday, August 24, 2017; (2) the deadline for the disclosure of final infringement contentions be extended 10 days from Monday, August 14, 2017 to Thursday, August 24, 2017; (3) the deadline for the disclosure of final responsive contentions on validity and non-infringement be extended 10 days from Friday, September 1, 2017 to Monday, September 11, 2017 (but that the current deadline of Friday, September 1, 2017 for the disclosure of final responsive contentions on domestic industry remain unchanged); and (4) the deadline for filing a motion to compel discovery be

extended four days from Monday, September 11, 2017 to Friday, September 15, 2017. For the avoidance of doubt, the Private Parties are not seeking to extend the deadlines for disclosure of final contentions regarding domestic industry, which are currently set for Monday, August 21, 2017 for Sony, and Friday, September 1, 2017 for ARRIS.

The Private Parties' requests are further set forth in the table below.

EVENT	CURRENT DEADLINE	PRIVATE PARTIES' PROPOSED DEADLINE
Deadline for Disclosure of Final Contentions for which each Party Bears the Burden of Proof: Invalidity Contentions	Monday, August 14, 2017	Thursday, August 24, 2017
Deadline for Disclosure of Final Contentions for which each Party Bears the Burden of Proof: Infringement Contentions	Monday, August 14, 2017	Thursday, August 24, 2017
Deadline for Disclosure of Final Responsive Contentions on Issues for which each Party Does Not Bear the Burden of Proof (Validity and Non-Infringement)	Friday, September 1, 2017	Monday, September 11, 2017
Last Day to File Motions to Compel Discovery	Monday, September 11, 2017	Friday, September 15, 2017

Good cause exists for this request because this brief extension of time will allow the Private Parties to provide more complete contention disclosures in light of certain third-party discovery that is still outstanding. For example, there are currently 17 outstanding third-party subpoenas in this investigation.¹ The need to obtain relevant documents from third-parties

¹ Sony has served third-party subpoenas on MediaTek USA Inc., MediaTek Inc., Qualcomm Inc., Broadcom Corp., The University of New Hampshire Interoperability Laboratory, DirecTV, LLC, and Jethead Development, Inc. ARRIS has served third-party subpoenas on RVU Alliance, Wi-Fi Alliance, Cisco Systems, Inc., Sigma Designs, Inc.,

constitutes the requisite good cause for extending deadlines pertaining to fact discovery. *See Certain Pers. Data & Mobile Commc'ns Devices & Related Software*, USITC Inv. No. 337-TA-710, Order No. 36, 2010 WL 4790249, at *1 (Nov. 3, 2010) (granting request to extend the deadlines for fact discovery, motions to compel, and depositions to accommodate third-party discovery); *Certain Pers. Computers, Server Computers, & Components Thereof*, USITC Inv. No. 337-TA-509, Order No. 29, 2005 WL 547373, at *1 (Mar. 3, 2005) (granting motion for an enlargement of time for fact discovery to accommodate third-party discovery); *Certain Pers. Computers, Monitors and Components Thereof*, USITC Inv. No. 337-TA-519, Order No. 25, 2005 WL 716655, at *1 (Mar. 25, 2005) (granting motion for a limited extension to the close of fact discovery to accommodate third-party discovery). Neither the Private Parties nor the public interest will suffer any prejudice in light of the requested extension, and the remainder of the Procedural Schedule will be unaffected.

Based on the foregoing, the Private Parties submit that good cause exists to extend the deadlines for the above due dates, as requested herein.

Dated: August 7, 2017

Respectfully submitted,

/s/ Hala S. Mourad

Lionel M. Lavenue
Gavin Ye, Ph.D.
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
11955 Freedom Drive
Reston, VA 20190-5675
(571) 203-2700

/s/ Christopher O. Green

Noah C. Graubart
Christopher O. Green
Aamir A. Kazi
Erin Alper
Sara C. Fish
Ashley A. Bolt
Charles N. Reese

STMicroelectronics, Inc., Texas Instruments Incorporated, Broadcom Limited, Motorola Solutions, Inc., Nokia USA Inc., and Technicolor USA, Inc.

(202) 408-4400 (fax)

Smith R. Brittingham IV
Hala S. Mourad
Sean D. Damon
Forrest A. Jones
David C. Seastrunk
Jonathan J. Fagan
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Avenue, N.W.
Washington, DC 20001
(202) 408-4000
(202) 408-4400 (fax)

Anita Bhushan
Kara Specht
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
271 17th Street, NW, Suite 1400
Atlanta, GA 30363
(404) 653-6400
(404) 653-64444 (fax)

Email: Sony-Arris-ITC@finnegan.com

*Counsel for Complainants
Sony Corporation and Sony Electronics Inc.*

Jacqueline Tio
FISH & RICHARDSON P.C.
1180 Peachtree St. NE, 21st Floor
Atlanta, GA 30309
Telephone: (404) 892-5005
Facsimile: (404) 892-5002

Ruffin B. Cordell
FISH & RICHARDSON P.C.
The McPherson Building
901 15th St., N.W., 7th Floor
Washington, D.C. 20005
Telephone: (202) 783-5070
Facsimile: (202) 783-2331

Email: FishService-ARRIS1049@fr.com

*Counsel for Respondents
ARRIS International plc, ARRIS Group, Inc.,
ARRIS Technology, Inc., ARRIS Enterprises,
LLC, ARRIS Solutions, Inc., ARRIS Global
Ltd., Pace Americas, LLC, Pace Americas
Holdings, Inc., Pace USA LLC, and Pace
Americas Investments, LLC*

**CERTAIN DIGITAL CABLE AND SATELLITE
PRODUCTS, SET-TOP BOXES, GATEWAYS, AND
COMPONENTS THEREOF**

Inv. No. 337-TA-1049

CERTIFICATE OF SERVICE

I, Michael Domenico, hereby certify that on August 7, 2017, copies of the foregoing were filed with and served upon the following as indicated:

<p>The Honorable Lisa R. Barton Secretary, Office of the Secretary U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, S.W., Room 112-F Washington, DC 20436 (202) 205-2000</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Courier (FedEx) <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Email (PDF File) <input checked="" type="checkbox"/> Via EDIS</p>
<p>The Honorable Judge Mary Joan McNamara Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W. Washington, DC 20436 Email: Jae.Lee@usitc.gov</p>	<p><input type="checkbox"/> Via First Class Mail <input checked="" type="checkbox"/> Via FedEx <input type="checkbox"/> Via Hand Delivery <input checked="" type="checkbox"/> Via Email (PDF File) <input type="checkbox"/> Via EDIS</p>
<p>Brian Koo, Esq. Office of Unfair Import Investigations U.S. International Trade Commission 500 E Street, S.W., Suite 401 Washington, D.C. 20436 Email: brian.koo@usitc.gov</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Courier (FedEx) <input type="checkbox"/> Via Hand Delivery <input checked="" type="checkbox"/> Via Email (PDF File) <input type="checkbox"/> Via EDIS</p>
<p>Counsel for Respondents ARRIS International plc, ARRIS Group, Inc., ARRIS Technology, Inc., ARRIS Solutions, Inc., ARRIS Global Ltd. (formerly Pace Ltd.), Pace Americas, LLC, Pace Americas Holdings, Inc., Pace USA LLC, and Pace Americas Investments, LLC, Christopher O. Green FISH & RICHARDSON P.C. 1180 Peachtree St. NE, 21st Floor Atlanta, GA 30309 Telephone: (404) 892-5005 Facsimile: (404) 892-5002 Email: FishService-ARRIS1049@fr.com</p>	<p><input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Courier (FedEx) <input type="checkbox"/> Via Hand Delivery <input checked="" type="checkbox"/> Via Email (PDF File) <input type="checkbox"/> Via EDIS</p>

/s/ Michael Domenico

Michael Domenico
Litigation Legal Assistant
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Avenue, NW
Washington, DC 20001
(202) 408-4000 (Telephone)
(202) 408-4400 (Facsimile)