

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PHILIPS NORTH AMERICA LLC,

Plaintiff,

v.

FITBIT, INC.,

Defendant.

Civil Action No. 1:19-cv-11586-FDS

**JOINT MOTION TO EXTEND THE TIME TO FILE DISCOVERY
MOTIONS RELATING TO PLAINTIFF'S MARCH 23, 2021 PRIVILEGE LOG**

The parties in the above-captioned matter file this joint motion seeking to extend the deadline for Defendant, Fitbit, Inc. (“Fitbit”), to file discovery motions that relate to Plaintiff Philips North America LLC’s (“Philips”) March 23, 2021 privilege log. Fact discovery in this matter closed on March 23, 2021 and the current deadline for filing discovery motions is March 31, 2021.

This joint motion is supported by good cause. The extension will permit the parties to continue to meet and confer in an effort to resolve pending disputes concerning Philips’s March 23, 2021 privilege log without judicial intervention. The extension will not impact any other deadlines in this matter and will not cause prejudice or delay in this action. Further, all parties have agreed to this extension request.

WHEREFORE, the Parties respectfully request that the Court grant this Joint Motion to extend the deadline to April 23, 2021 for Defendant to file discovery motions related to Plaintiff’s March 23, 2021 privilege log.

Date: March 31, 2021

Respectfully Submitted,

/s/ Ruben J. Rodrigues

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Respectfully Submitted,

/s/ Karim Z. Oussayef

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SO ORDERED this ___ day of _____ 2020.

UNITED STATES DISTRICT JUDGE

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Karim Z. Oussayef, counsel for Defendant, hereby certifies that counsel for Defendant met and conferred with counsel for Plaintiff on March 30, 2021, wherein counsel for Plaintiff stated that they agree to this extension request.

/s/ Karim Z. Oussayef _____

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Elizabeth A. DiMarco _____