

**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 APRIL 16, 2021 PRIVILEGE LOG**

The parties in the above-captioned matter file this joint motion seeking to further extend the deadline for Defendant, Fitbit, Inc. ("Fitbit"), to file discovery motions that relate to Plaintiff Philips North America LLC's ("Philips") April 16, 2021 privilege log. Fact discovery in this matter closed on March 23, 2021 and the current deadline for filing motions relating to Philips's April 16, 2021 privilege log is June 8, 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 without judicial intervention. In particular, to narrow the potential issues in dispute, Philips has agreed to provide additional information substantiating its bases for asserting privilege. Thus, this extension is necessary to enable Philips to gather and provide that additional information and to provide Fitbit with a reasonable period to respond. 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 June 18, 2021 for Fitbit to file discovery motions related to Philips's April 16, 2021 privilege log.

Date: June 8, 2021

Respectfully Submitted,

/s/ Ruben J. Rodrigues

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SO ORDERED this ___ day of _____ 2021.

UNITED STATES DISTRICT JUDGE

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Ruben Rodrigues, counsel for Plaintiff, hereby certify that counsel for Defendant met and conferred with counsel for Plaintiff on June 8, 2021, wherein counsel for Plaintiff stated that they agree to this extension request.

/s/ Ruben J. Rodrigues _____

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/ Ruben J. Rodrigues _____