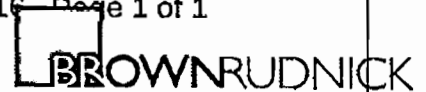


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September 20, 2016

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Hon. Laura Taylor Swain
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

RE: Broadsign International, LLC v. T-Rex Property AB, 16-cv-4586 (LTS) (HBP)

Dear Judge Swain:

We represent Plaintiff Broadsign International, LLC ("Broadsign") in the above-referenced action. We are writing to advise the Court that, despite its best efforts, Broadsign has been unable to serve the Summons and Complaint on Defendant T-Rex Property AB ("T-Rex") and, for that reason, will be unable to submit an agreed upon Preliminary Pre-Trial Statement as required by Your Honor's Initial Conference Order entered July 26, 2016 (Dkt. 9).

T-Rex is a prolific non-practicing entity that has filed approximately 59 patent infringement actions throughout the United States since 2012, five of those cases in this very District. Shortly after filing the Complaint, we spoke with T-Rex's counsel and asked if T-Rex would accept service or agree to waive service in accordance with Fed. R. Civ. P. 4 (d). T-Rex refused. We have consulted counsel in Sweden and are now in the process of serving T-Rex in accordance with the provisions of the Hague Convention. For these reasons, Broadsign requests additional time to comply with the Court's Initial Pre-Trial Conference Order.

The Court has scheduled an initial conference on October 6, 2016 at 11:45 AM. Broadsign also requests that the conference be adjourned without date until the Summons and Complaint have been served.

Respectfully submitted,

BROWN RUDNICK LLP

Alfred R. Fabricant

ARF:cs

cc: Via Facsimile - Chambers of Judge Swain (212) 805-0426

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The conference is adjourned to March 24, 2017, at 10:00 AM and the related deadlines are modified accordingly. DE #11 resolved.

SO ORDERED

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

Brown Rudnick LLP Boston | Dublin | Hartford | London | New York | Orange County