

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROSETTA-WIRELESS CORP., an Illinois Corporation,)
)

Plaintiff)

v.)

Civil Action No. 15-cv-00799

APPLE INC., a California Corporation,)
SAMSUNG ELECTRONICS CO. LTD., a)
Foreign Corporation, SAMSUNG)
ELECTRONICS AMERICA, INC., a New)
York Corporation, SAMSUNG)
TELECOMMUNICATIONS AMERICA,)
LLC, a California Corporation, MOTOROLA,)
INC., a Delaware Corporation, MOTOROLA)
MOBILITY LLC, a Delaware Corporation, LG)
ELECTRONICS CO., a Foreign Corporation,)
LG ELECTRONICS USA INC., a Delaware)
Corporation, HIGH TECH COMPUTER)
CORP., a/k/a HTC CORP., a Foreign)
Corporation, and HTC AMERICA INC., a)
Washington Corporation,)

Judge Sara L. Ellis

Defendants.)

**AGREED MOTION FOR EXTENSION OF TIME FOR
THE LG DEFENDANTS TO RESPOND TO PLAINTIFF’S COMPLAINT**

Plaintiff Rosetta-Wireless Corporation (“Rosetta” or “Plaintiff”) respectfully moves this Court for entry of an Order granting Defendants LG Electronics Co. and LG Electronics USA Inc. (collectively, “LG Defendants”) an extension of time through and including June 4, 2015, to respond to Rosetta’s complaint, and states:

1. Defendant LG Electronics USA Inc. was served with Plaintiff's Complaint on February 13, 2015, and LG Electronics USA Inc.'s response to the Complaint currently is due on March 6, 2015.

2. LG Electronics USA Inc. has agreed, for purposes of this case only, to accept service of Plaintiff's Complaint on behalf of LG Electronics Co. if Plaintiff agrees to and does not oppose this Motion for Extension to Time seeking a ninety (90) day extension of time for the LG Defendants to respond to Plaintiff's Complaint.

3. Rosetta agrees that the deadline for both LG Electronics Co. and LG Electronics USA Inc. to respond to the Complaint will be June 4, 2015.

4. No prior motions for extension of time with respect to the LG Defendants have been made.

5. This extension is not meant for improper delay of this proceeding. The LG Defendants have represented to Rosetta that they will use the additional time to review the allegations in the Complaint and draft the appropriate response. Further, the parties will explore whether early resolution is possible. Rosetta does not oppose the extension sought by the LG Defendants.

WHEREFORE, Plaintiff Rosetta-Wireless Corporation respectfully requests that this Court enter an Order granting LG Electronics Co. and LG Electronics USA Inc. an extension of time through and including June 4, 2015, to respond to the Plaintiff's complaint.

Date: March 2, 2015

KOBRE & KIM LLP

s/ Michael Ng

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Plaintiff)
v.)
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APPLE INC., a California Corporation,)
SAMSUNG ELECTRONICS CO. LTD., a Foreign Corporation, SAMSUNG ELECTRONICS AMERICA, INC., a New York Corporation, SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a California Corporation, MOTOROLA, INC., a Delaware Corporation, MOTOROLA MOBILITY LLC, a Delaware Corporation, LG ELECTRONICS CO., a Foreign Corporation, LG ELECTRONICS USA INC., a Delaware Corporation, HIGH TECH COMPUTER CORP., a/k/a HTC CORP., a Foreign Corporation, and HTC AMERICA INC., a Washington Corporation,)
Defendants.)

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2015, I electronically submitted the AGREED MOTION FOR EXTENSION OF TIME FOR THE LG DEFENDANTS TO RESPOND TO PLAINTIFF’S COMPLAINT, along with this Certificate of Service, with the clerk of the court for the U.S. District Court, Northern District of Illinois, using the CM/ECF system of the court which will send notification of such filing via electronic mail to all counsel of record. A copy of this document has also been served by email to:

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s/ Michael Ng _____

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