IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

RYUJIN FUJINOMAKI, Pro Se	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 2:15-cv-1381
	§	JRG/RSP
GOOGLE INC., SAMSUNG ELECTRONICS	§	
CO.LTD., SAMSUNG ELECTRONICS	§	
AMERICA, INC., SAMSUNG	§	
TELECOMMUNICATIONS AMERICA,	§	
LLC., MOTOROLA MOBILITY	§	
HOLDINGS, INC., MOTOROLA	§	
MOBILITY LLC, LG ELECTRONICS INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC., LG ELECTRONICS U.S.A.,	§	
INC., AUSTEK COMPUTER INC., ASUS	§	
COMPUTER INTERNATIONAL, INC., and	§	
HUAWEI TECHNOLOGIES CO., LTD.	§	
Defendants.	§	

<u>UNOPPOSED MOTION OF HUAWEI TECHNOLOGIES CO., LTD., FOR EXTENSION</u> OF TIME TO RESPOND TO COMPLAINT FOR PATENT INFRINGEMENT

Defendants Huawei Technologies Co., Ltd. ("Defendant"), without waiving any defenses described or referenced in Federal Rule of Civil Procedure 12, file this unopposed Motion for Extension of Time to Respond to Ryujin Fujinomaki's Complaint for Patent Infringement.

Plaintiff filed his Complaint on July 31, 2015, naming Huawei Technologies Co. Ltd. as a defendant. Defendant Huawei Technologies Co., Ltd. is a Chinese entity wholly located in China. Defendant Huawei Technologies Co. Ltd. agreed to waive service via The Hague Convention in exchange for an extension of time to respond to the Complaint. Specifically, Defendant requests an extension of time to November 23, 2015 to answer, move, or otherwise respond to the Complaint. Plaintiff does not oppose this Motion.

For the foregoing reasons, Defendant respectfully requests that this Court grant an extension

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of time until and including November 23, 2015, for Defendant to respond to the Complaint for Patent Infringement.

Respectfully submitted,

/s/ K.D. Shull K.D. Shull Texas Bar No. 24033067 Huawei Technologies USA Inc. 5700 Tennyson Parkway, Suite 500 Plano, TX 75024 Telephone: 214-919-6001 E-mail: kd.shull@huawei.com

ATTORNEY FOR DEFENDANT HUAWEI TECHNOLOGIES CO., LTD.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by electronic mail on this the 19th day of September, 2015.

/s/ K.D. Shull	
K.D. Shull	

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