

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IRONBURG INVENTIONS LTD.

*Plaintiff,*

v.

COLLECTIVE MINDS GAMING  
CO. LTD.

*Defendant.*

Civil Action No. 1:16-cv-04110-TWT

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO THE PLAINTIFF’S  
COMPLAINT FOR PATENT INFRINGEMENT**

Defendant Collective Minds Gaming Co. Ltd. (“CMG” or “Defendant”) hereby submits this unopposed motion moving this Court for an extension of time within which Defendant must answer, move, or otherwise respond to Plaintiff Ironburg Inventions Ltd.’s (“Ironburg” or “Plaintiff”) Complaint for Patent Infringement (“Complaint”). A proposed Order is attached to this Motion.

In support of its motion, Defendant states as follows:

1. On November 2, 2016, Plaintiff filed its Complaint against Defendant.

[Dkt. 1].

2. Defendant was served on January 4, 2017.
3. The below counsel of record have recently been retained to appear on behalf of Defendant in this case.
4. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), Defendant is required to answer or otherwise respond to Plaintiff's Complaint by January 25, 2017.
5. Defendant requires additional time to investigate and prepare an appropriate response to the Complaint, which accuses Defendant of direct and induced infringement of five different patents.
6. The deadline for Defendant to answer or otherwise respond to the Complaint has not previously been extended.
7. Defendant respectfully requests an extension of thirty (30) days, moving the deadline for Defendant to answer or otherwise respond to the Complaint to **February 24, 2017**.
8. Counsel for Plaintiff has indicated that Plaintiff does not oppose Defendant's requested extension.

Dated: January 18, 2017

Respectfully Submitted,

HILL, KERTSCHER & WHARTON, LLP

/s/ Steven G. Hill

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*Attorneys for Defendant Collective Minds  
Gaming Co. Ltd.*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D**

Pursuant to LR 7.1(D), the undersigned counsel certifies that this motion has been prepared using Times New Roman 14-point font, as permitted under LR 5.1(C).

Dated: January 18, 2017

Respectfully submitted,

/s/ Steven G. Hill  
Steven G. Hill  
Georgia Bar No. 354658

*Attorney for Defendant  
Collective Minds Gaming Co. Ltd.*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on January 18, 2017, a true and correct copy of the **Defendant's Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Plaintiff's Complaint for Patent Infringement** was filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

Cynthia R. Parks  
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730 Peachtree St. NE, Suite 600  
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The undersigned counsel further certifies that on January 18, 2017, a copy of the foregoing was sent to the following counsel for Plaintiff via electronic mail:

Robert D. Becker  
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Dated: January 18, 2017

Respectfully submitted,

/s/ Steven G. Hill  
Steven G. Hill  
Georgia Bar No. 354658

*Attorney for Defendant  
Collective Minds Gaming Co. Ltd.*