IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A	§	
	§	
Plaintiffs,	§	
	§	
V.	§	Civil Action No. 3:18-cv-00559-M
	§	
LG ELECTRONICS, U.S.A., INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC. and	§	
LG ELECTRONICS, INC.,	§	
	§	
Defendants.	§	

LG DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTFFS' COMPLAINT FOR PATENT INFRINGEMENT

Defendants LG Electronics, Inc. ("LGEKR"), LG Electronics U.S.A., Inc. ("LGEUS"), and LG Electronics MobileComm U.S.A., Inc. ("LGEMU"), (collectively the "Defendants") with the agreement of Plaintiffs Uniloc USA, Inc. and Uniloc Luxembourg, S.A., hereby, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time for Defendants to move, answer or otherwise respond to Plaintiffs' Complaint for Patent Infringement ("Complaint") to June 11, 2018, and in support thereof respectfully indicate the following:

- 1. Plaintiffs filed their Complaint on March 9, 2018.
- 2. LGEUS and LGEMU were served with a copy of the Complaint on or about March 20, 2018. LGEKR is a foreign entity and has not yet been served.
- 3. The parties have agreed, for purposes of this case only, that LGEKR will waive service of the Complaint under the Hague Convention in exchange for Plaintiffs' agreement for



an extension of time to/ June 11, 2018, for Defendants to answer or otherwise plead in response to the Complaint.

4. Defendants' extension agreement with Plaintiffs is not to be construed as a waiver of any other rights or defenses, including, by way of example, defenses described or referred to in Rule 12 F.R.C.P., and Defendants' right to file counterclaims and/or affirmative defenses.

Wherefore, Defendants LGEUS, LGEMU, and LGEKR respectfully request that the Court enter an order extending the deadline to June 11, 2018, for Defendants to move, answer or otherwise respond to Plaintiffs' Complaint for Patent Infringement.

Date: April 9, 2018 Respectfully submitted,

/s/ Vic Henry

Vic H. Henry

vhhenry@hoaf.com

Texas Bar No. 09484250

Lane Fletcher

lanefletcher@hoaf.com

Texas State Bar No. 07139300

HENRY ODDO AUSTIN & FLETCHER a Professional Corporation

1700 Pacific Avenue, Suite 2700

Dallas, Texas 75201

Telephone: (214) 658-1900 Facsimile: (214) 658-1919

ATTORNEYS FOR THE DEFENDANTS LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC. and LG ELECTRONICS MOBILECOMM U.S.A., INC.



CERTIFICATE OF CONFERENCE

I hereby certify that on April 6, 2018, I spoke with Anthony Vecchione, counsel for Plaintiffs, regarding the matters addressed in this Motion and that the parties agree to the relief requested in this Motion.

By: <u>/s/ Vic Henry</u> Vic Henry

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April 2018, a true and correct copy of the foregoing instrument has been served via the Court's ECF system on all counsel of record in accordance with the Federal Rules of Civil Procedure and via regular U.S. mail to the address listed in Plaintiffs' Complaint for counsel not served via the Court's ECF system.

By: <u>/s/ Lane Fletcher</u>
Lane Fletcher

