

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

**UNILOC USA, INC. and  
UNILOC LUXEMBOURG, S.A**

**Plaintiffs,**

**v.**

**LG ELECTRONICS, U.S.A., INC.,  
LG ELECTRONICS MOBILECOMM  
U.S.A., INC. and  
LG ELECTRONICS, INC.,**

**Defendants.**

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**Civil Action No. 3:18-cv-00559-M**

**LG DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' 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

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**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: /s/ Vic Henry  
Vic Henry

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> 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: /s/ Lane Fletcher  
Lane Fletcher