

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

**Luminati Networks Ltd.,**

**Plaintiff,**

**v.**

**Teso LT, UAB, Oxysales, UAB, and  
Metacluster LT, UAB,**

**Defendants.**

**Civil Action No.  
2:19-cv-00395-JRG**

**UNOPPOSED MOTION TO EXTEND DEADLINE TO  
ANSWER OR OTHERWISE RESPOND TO COMPLAINT AND  
SET BRIEFING SCHEDULE ON MOTION TO DISMISS**

Defendants Teso LT, UAB (“Teso”), Oxysales, UAB (“Oxysales”), and Metacluster LT, UAB (“Metacluster”) (collectively, “Defendants”) file this Unopposed Motion to Extend Deadline to Answer or Otherwise Respond to Complaint and Set Briefing Schedule on Motion to Dismiss, and respectfully show as follows:

The Lithuanian Central Authority delivered a copy of the Complaint to Metacluster on February 18, 2020, to Teso on February 21, 2020, and to Oxysales on March 3, 2020. There is a disagreement between the parties as to whether this service was effective under the Hague Convention, but Defendants agree to accept service of the Complaint and Plaintiff Luminati Networks Ltd. (“Luminati”) agrees to an extension of the deadline for Defendants to answer or otherwise respond to the Complaint, and a briefing schedule with respect to Defendants’ anticipated motion to dismiss.

Luminati and Defendants have agreed on the following schedule and, as such, the parties respectfully request that the Court enter an Order memorializing it:

- Deadline for Defendants to Answer or Otherwise Respond to the Complaint: March 24, 2020;
- Luminati's Response to Any Motion to Dismiss: 21 days after any motion to dismiss is filed;
- Defendants' Reply In Support of Any Motion to Dismiss: 14 days after Luminati's Response is filed; and
- Luminati's Sur-Reply: 14 days after Defendants' Reply is filed.

With respect to the contemplated motion to dismiss to be filed on or before March 24, 2020, Defendants have agreed to file one motion to dismiss on all Defendants' behalves.

Dated: March 5, 2020

Respectfully submitted,



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*Counsel for Defendants Teso LT, UAB,  
Oxyales, UAB, and Metacuster LT, UAB*

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that, on March 5, 2020, he met and conferred with Luminati's counsel Ronald Wielkopolski, Esq., and that Luminati is not opposed to the relief requested in the foregoing motion.

A handwritten signature in black ink, appearing to read 'St Callahan', written over a horizontal line.

STEVEN CALLAHAN

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on March 5, 2020. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

A handwritten signature in black ink, appearing to read 'St Callahan', written over a horizontal line.

STEVEN CALLAHAN