

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

RFCYBER CORP.,
Plaintiff,
v.
GOOGLE LLC and GOOGLE PAYMENT
CORP.,
Defendants.

§
§ Case No. 2:20-cv-00274-JRG
(LEAD CASE)
§
§ **JURY TRIAL DEMANDED**
§
§
§
§
§
§

RFCYBER CORP.,
Plaintiff,
v.
SAMSUNG ELECTRONICS CO. LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,
Defendants.

§
§ Case No. 2:20-cv-00335-JRG
(MEMBER CASE)
§
§ **JURY TRIAL DEMANDED**
§
§
§
§
§
§

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff RFCyber Corp. (“RFCyber”) and Defendants Google LLC, Google Payment Corp., Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants”) respectfully request an extension of time for RFCyber to comply with P. R. 3-1 & 3-2 (Infringement Contentions) from April 28, 2021 up to and including May 12, 2021 and for Defendants to comply with P. R. 3-3 & 3-4 (Invalidity Contentions) and to comply with the Standing Order Regarding Subject-Matter Eligibility Contentions from June 23, 2021 up to and including July 14, 2021.

The Parties do not file this Joint Motion for the purpose of delay, but rather to allow the Parties to adequately address the issues associated with the pending Contentions and in order that justice be done.

Dated: April 27, 2021

Respectfully submitted,

/s/ Vincent J. Rubino, III
Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com
FABRICANT LLP
411 Theodore Fremd Road, Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Samuel F. Baxter
State Bar No. 01938000
Email: sbaxter@mckoolsmith.com
Jennifer L. Truelove
State Bar No. 24012906
Email: jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

**ATTORNEYS FOR PLAINTIFF,
RFCYBER CORP.**

/s/ Zachary M. Briers (with permission)
Michael E. Jones
Texas Bar No. 10929400
Email: mikejones@potterminton.com
POTTER MINTON, PC
110 North College, Suite 500

Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 993-0846

OF COUNSEL:

Zachary M. Briers (pro hac vice)
Email: zachary.briers@mto.com
Heather E. Takahashi (pro hac vice)
Email: heather.takahashi@mto.com
Vincent Y. Ling (pro hac vice)
Email: vinny.ling@mto.com
Robin S. Gray (pro hac vice)
Email: robin.gray@mto.com
Mica L. Moore (pro hac vice forthcoming)
Email: robin.gray@mto.com

MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071-3426
Telephone: (213) 683-9100
Email: mica.moore@mto.com

***ATTORNEYS FOR DEFENDANTS
GOOGLE LLC. AND GOOGLE
PAYMENT CORP.***

/s/ Allan A. Kassenoff (with permission)

Melissa R. Smith
State Bar No. 24001351
Email: melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Allan A. Kassenoff
New York Bar No. 2964545
Email: kassenoffa@gtlaw.com
Jeffrey R. Colin
New York Bar No. 4758272
Email: colinj@gtlaw.com
Richard A. Edlin
New York Bar No. 2051696
Email: edlinr@gtlaw.com
Vimal M. Kapadia

New York Bar No. 5269543
Email: kapdadiav@gtlaw.com
GREENBERG TRAURIG, LLP
MetLife Building, 200 Park Avenue
New York, New York 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400

***ATTORNEYS FOR DEFENDANTS
SAMSUNG ELECTRONICS CO. LTD.
and SAMSUNG ELECTRONICS
AMERICA, INC.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 27, 2021, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Vincent J. Rubino, III
Vincent J. Rubino, III

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Vincent J. Rubino, III
Vincent J. Rubino, III