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

RFCYBER CORP., Case No. 2:20-cv-00336-JRG

888888888 Plaintiff, **JURY TRIAL DEMANDED**

v. LG ELECTRONICS, INC.,

Defendant.

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff RFCyber Corp. ("RFCyber") and Defendant LG Electronics, Inc. ("LG") (collectively, the "Parties") hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement.

All matters in controversy between the Parties have been settled in principle. The Parties respectfully request a stay of all case deadlines for thirty (30) days while the Parties finalize a settlement agreement and file dismissal documents with the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: July 30, 2021 Respectfully submitted,

/s/ Alfred R. Fabricant

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 Avenue, Suite 206 South



Rye, New York 10580 Telephone: (212) 257-5797 Facsimile: (212) 257-5796

Samuel F. Baxter
Texas State Bar No. 01938000
Email: sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
Email: jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.

104 East Houston Street, Suite 300 Marshall, Texas 75670 Telephone: (903) 923-9000 Facsimile: (903) 923-9099

ATTORNEYS FOR PLAINTIFF RFCYBER CORP.

/s/ Steven Pepe (with permission)

Steven Pepe NY Bar No. 2810430 Steven.Pepe@ropesgray.com Alexander E. Middleton NY Bar No. 4797114 Alexander.Middleton@ropesgray.com Lance W. Shapiro NY Bar No. 5397955 Lance.Shapiro@ropesgray.com

ROPES & GRAY LLP

1211 Avenue of the Americas New York, NY 10036-8704 Telephone: (212) 596-9000 Facsimile: (212) 596-9090

David S. Chun
CA Bar No. 315958
David.Chun@ropesgray.com
ROPES & GRAY LLP

1900 University Avenue 6th Floor

East Palo Alto, CA 94303-2284 Telephone: (650) 617-4000 Facsimile: (650) 617-4090

Melissa R. Smith

Melissa R. Smith Texas Bar No. 24001351



Email: melissa@gillamsmithlaw.com

GILLAM & SMITH LLP

303 South Washington Avenue Marshall, Texas 75702670

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

ATTORNEYS FOR DEFENDANT LG ELECTRONICS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 30, 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/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

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

/s/ Alfred R. Fabricant
Alfred R. Fabricant

