

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
HUAWEI DEVICE USA INC., HUAWEI	§	Civil Action No. 2:17-CV-513-JRG
DEVICE CO., LTD. AND HUAWEI	§	(Lead Case)
DEVICE (DONGGUAN) CO., LTD.,	§	
HTC CORPORATION,	§	Civil Action No. 2:17-CV-514-JRG
LG ELECTRONICS, INC.,	§	Civil Action No. 2:17-CV-515-JRG
APPLE INC.,	§	Civil Action No. 2:17-CV-516-JRG
ZTE CORPORATION, ZTE (USA), INC.,	§	Civil Action No. 2:17-CV-517-JRG
AND ZTE (TX), INC.,	§	
Defendants.		

**JOINT MOTION TO CONTINUE EVIDENTIARY HEARING ON LG ELECTRONICS
INC.'S MOTION TO DISMISS FOR LACK OF JURISDICTION**

Plaintiff AGIS Software Development LLC (“AGIS”) and Defendant LG Electronics Inc. (“LGEKR”) hereby file this Joint Motion to Continue this Court’s evidentiary hearing on LGEKR’s Motion to Dismiss for Lack of Jurisdiction which is set for July 6, 2018, at 9:00 A.M (Dkt. 144). The parties respectfully request that the hearing originally set for July 6, 2018 be reset at the Court’s convenience during the week of August 13, 2018 or at such other date thereafter.

Good cause supports the requested extension because it would provide sufficient time for the parties to complete discovery in an orderly fashion on the jurisdictional issues related to the hearing. Following the Court’s notice setting an evidentiary hearing on LGEKR’s motion, AGIS requested that LG provide documents relating to how LG’s subsidiaries take possession of the accused products and requested a deposition of LG’s declarant, JuSeong Ryu. AGIS also issued

document and deposition subpoenas on two third-party LG subsidiaries, LG Electronics MobileComm U.S.A. Inc. (“LGEMU”) and LG Electronics MobileResearch U.S.A. LLC (“LGEMR”) on June 8, 2018.

LGEKR is in the process of collecting documents in response to AGIS’s request, and third parties LGEMU and LGEMR are cooperating in good faith to complete document productions in response to AGIS’s discovery requests. Following review of the documents produced, the parties will proceed diligently to complete the deposition of Mr. Ryu and a deposition of LGEMU. Both parties have proceeded promptly, diligently and in good faith in requesting and responding to discovery, but are unable to complete that discovery in an orderly fashion under the current schedule.

In addition, counsel for AGIS is unavailable due to pre-existing trial commitments from mid-July to early August, and therefore has requested that the evidentiary hearing be reset for no earlier than the week of August 13, 2018.

For the foregoing reasons, the parties respectfully submit that the Joint Motion to Continue the Evidentiary Hearing on LGEKR’s Motion to Dismiss for Lack of Jurisdiction should be granted.

Dated: June 22, 2018

Respectfully submitted by:

/s/ Mark Mann

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 22, 2018, a true and correct copy of the foregoing was served to the parties' counsel of record via ECF pursuant to Local Rule CV-5(d).

/s/ Mark Mann

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel have complied with the meet and confer requirement in Local Rule CV-7(h) and this Court's Orders, and this motion is unopposed.

/s/ Mark Mann