

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

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

JOINT MOTION FOR ENTRY OF FIFTH AMENDED DOCKET CONTROL ORDER

Plaintiff AGIS Software Development LLC, and Defendants Huawei Device USA Inc., Huawei Device Co., Ltd., and Huawei Device (Dongguan) Co., Ltd., Defendant LG Electronics, Inc., Defendant HTC Corporation, Defendants ZTE (USA), Inc. and ZTE (TX), Inc. (collectively “ZTE”) and Defendant Apple Inc. (“Parties”), hereby submit this Joint Motion For Entry of a Fifth Amended Docket Control Order and show the Court as follows:

The current deadline to Complete Mediation is September 28, 2018. The parties request an extension until October 15, 2018.

The current deadlines to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof, Serve Disclosures for Rebuttal Expert Witnesses, Complete Expert Discovery, File Dispositive Motions, and File Motions to Strike Expert Testimony (including *Daubert* Motions) are set forth in the following chart. The parties request the extensions listed below.

Original Date	New Proposed Date	Event
October 15, 2018	October 26, 2018	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
November 5, 2018	November 16, 2018	Serve Disclosures for Rebuttal Expert Witnesses
December 3, 2018	December 7, 2018	Deadline to Complete Expert Discovery
December 7, 2018	December 14, 2018	File Dispositive Motions
December 7, 2018	December 14, 2018	File Motions to Strike Expert Testimony (including <i>Daubert</i> Motions)

Good cause exists to adjust the deadlines to File Dispositive Motions and File Motions to Strike Expert Testimony (including *Daubert* Motions) to allow for the conclusion of expert discovery one-week in advance of these deadlines. The parties have been working diligently to schedule fact depositions for months but were unable to schedule certain depositions until the very end of the fact discovery period, and depositions of some key witnesses have yet to be scheduled. Accordingly, the parties are requesting an extension of the expert discovery deadlines, and related deadlines for dispositive motions and motions to strike including *Daubert* motions, to allow for sufficient time between the conclusion of fact depositions and the expert discovery deadlines.

The Parties have conferred and agreed upon all provisions of the Fifth Amended Docket Control Order and hereby jointly move that the Court approve and enter same, a copy of which is attached hereto for the Court's entry.

Dated: August 16, 2018

Respectfully submitted,

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