

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

**AGIS SOFTWARE DEVELOPMENT
LLC,**

Plaintiff,

v.

**ZTE CORPORATION, ZTE (USA) INC.,
AND ZTE (TX), INC.,**

Defendants.

Case No. 2:17-CV-00517-JRG

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR DEFENDANTS' REPLY TO
PLAINTIFF'S RESPONSE TO MOTION TO DISMISS COMPLAINT FO FAILURE TO
STATE A CLAIM AND IMPROPER VENUE OR IN THE ALTERNATIVE TO
TRANSFER (D.E. 46)**

This Motion is unopposed. Defendants ZTE (USA) Inc. and ZTE (TX), Inc. ("ZTE") hereby respectfully move the Court to extend the deadline for ZTE to reply to Plaintiff AGIS Software Development LLC's ("Plaintiff") Response to the Motion to Dismiss Plaintiff's Complaint for Failure to State a Claim and Improper Venue or in the Alternative to Transfer (Dkt. No. 46) by 3 days, from January 19, 2018 to January 24, 2018. Further, the Parties stipulate and agree to an extension of time for Plaintiff's Sur-Reply in support of the above-referenced Response (Dkt. No. 46) from January 30, 2018 to February 2, 2018. If approved, this extension accommodates employee schedules as well as vacation and holiday issues due to the Dr. Martin Luther King, Jr. weekend.

The Defendants do not file this Unopposed Motion for the purposes of delay, but rather to allow for the complexity of the issues associated with the pending Motions, to accommodate vacation and holiday schedules, and in order that justice be done.

Dated: January 17, 2018

/s/ Lionel M. Lavenue

Lionel M. Lavenue
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ATTORNEY FOR DEFENDANTS
ZTE (USA) INC. AND ZTE (TX), INC.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this January 17, 2018, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

Lionel M. Lavenue
Lionel M. Lavenue

CERTIFICATE OF CONFERENCE

The undersigned attorney hereby certifies that counsel for Defendants, Lionel Lavenue, conferred with counsel for Plaintiff, Vincent Rubino, via e-mail on January 16, 2018 and there is not opposition to the relief requested in this motion.

Lionel M. Lavenue
Lionel M. Lavenue