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

GESTURE TECHNOLOGY PARTNERS, LLC

Plaintiff,

v.

HUAWEI DEVICE CO., LTD., HUAWEI DEVICE USA INC.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00040-JRG

## RENEWED JOINT MOTION TO STAY CERTAIN DEADLINES AND NOTICE OF PARTIAL SETTLEMENT

Plaintiff Gesture Technology Partners, LLC ("Plaintiff") and Defendants Huawei Device Co., Ltd. and Huawei Device USA Inc. ("Defendants"), by and through their undersigned attorneys, hereby file this Renewed Joint Motion to Stay All Deadlines and Notice of Settlement between Plaintiff and Defendants.

Plaintiff and Defendants previously filed a Joint Motion to Stay Certain Deadlines and Notice of Partial Settlement on October 19, 2021. Dkt. 101. The Court granted that motion on October 29, 2021, and ordered the parties to submit dismissal papers no later than November 29, 2021. Dkt. 109. Dismissal of this case is partially based on a settlement between Plaintiff and Defendants. Plaintiff and Defendants require additional time to finalize a settlement agreement between them, given the scope of that agreement and the presence of signatories in China.

The parties wish to conclude the settlement without burdening the Court with additional filings and without incurring unnecessary expense. Plaintiff and Defendants anticipate they will be able to submit dismissal papers on December 6, 2021. Accordingly, the parties respectfully request



that the Court grant a stay of all proceedings between Plaintiff and Defendants, including all pending deadlines between the parties until December 6, 2021

The parties submit that good cause exists for granting this renewed and agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served. Wherefore, the parties respectfully request that the Court enter the proposed order submitted with this joint motion as set forth above and grant the parties such order and further relief to which they are entitled.

Dated: November 29, 2021

By: /s/ Fred I. Williams

Fred I. Williams

Texas State Bar No. 00794855

Michael Simons

Texas State Bar No. 24008042

Robert Daniel Garza

Texas State Bar No. 24097730

Robert Rhodes

Texas State Bar No. 24116958

WILLIAMS SIMONS & LANDIS PLLC

The Littlefield Building

601 Congress Avenue, Suite 600

Austin, TX 78701

Tel: 512-543-1354

fwilliams@wsltrial.com

msimons@wsltrial.com

dgarza@wsltrial.com

rrhodes@wsltrial.com

Todd E. Landis

State Bar No. 24030226

WILLIAMS SIMONS & LANDIS PLLC

2633 McKinney Ave., Suite 130 #366

Dallas, TX 75204

Tel: 512-543-1357

tlandis@wsltrial.com

Respectfully submitted,

By: /s/ Mark Mann

Mark Mann

SBN: 12926150

mark@themannfirm.com

G. Blake Thompson

SBN: 24042033

blake@themannfirm.com

MANN TINDEL & THOMPSON

300 West Main Street

Henderson, Texas 75652

Tel: 903-657-8540

Kent E. Baldauf, Jr.

kbaldaufjr@webblaw.com

Bryan P. Clark

bclark@webblaw.com

THE WEBB LAW FIRM

420 Ft. Duquesne Blvd., Suite 1200

Pittsburgh, PA 15222

Tel: 412-471-8815

Matthew S. Warren

Erika Warren

Jennifer A. Kash

WARREN LEX LLP

2261 Market Street, No. 606



John Wittenzellner Pennsylvania State Bar No. 308996 WILLIAMS SIMONS & LANDIS PLLC 1735 Market Street, Suite A #453 Philadelphia, PA 19103 Tel: 512-543-1373 johnw@wsltrial.com

Attorneys for Plaintiff Gesture Technology Partners, LLC San Francisco, California 94114 Tel: 415-895-2940 21-040@cases.warrenlex.com

Attorneys for Defendants Huawei Device Co., Ltd., and Huawei Device USA, Inc.



## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 29, 2021, the undersigned caused a copy of the foregoing document to be served on all counsel of record via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams
Fred I. Williams

## **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Gesture Technology Partners, LLC and counsel for Huawei Device Co., Ltd. and Huawei Device USA, Inc. met and conferred, and all parties agree to filing the foregoing document as a joint motion.

/s/ Fred I. Williams
Fred I. Williams

