

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	Case No. 2:21-cv-00072-JRG
Plaintiff,	§	(LEAD CASE)
	§	
v.	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
T-MOBILE USA, INC. and T-MOBILE US,	§	
INC.,	§	
Defendants.	§	
	§	
AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 2:21-cv-00024-JRG
	§	(MEMBER CASE)
Plaintiff,	§	
	§	<b><u>JURY TRIAL DEMANDED</u></b>
v.	§	
	§	
LYFT, INC.,	§	
Defendant.	§	

**JOINT MOTION TO STAY THE CASE WITH RESPECT TO DEFENDANT LYFT  
UNTIL A RULING ON THE REPORT AND RECOMMENDATION (DKT. 212) ON  
DEFENDANT LYFT, INC.’S MOTION TO DISMISS FOR IMPROPER VENUE (DKT.  
30) AND FOR AN EXTENSION OF TIME FOR PLAINTIFF AGIS SOFTWARE  
DEVELOPMENT LLC’S OBJECTIONS AND MOTION FOR RECONSIDERATION**

Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”) and Defendant Lyft, Inc. (“Lyft” or Defendant”) jointly move, with the Court’s permission, to stay all deadlines in this case with respect to Lyft until a ruling on Magistrate Judge Payne’s Report and Recommendation (Dkt. 212) finding venue improper in this case and for an extension of time for AGIS to file its objections and motion for reconsideration regarding the Report and Recommendation (Dkt. 212) on Defendant Lyft, Inc.’s (“Lyft” or “Defendant”) Motion to Dismiss (Dkt. 30) from November 24, 2021 to on or before December 8, 2021.

The Parties respectfully request that the Court grant this Unopposed Motion and does not

file this Motion for purposes of delay, but rather to allow AGIS to adequately address the complexity of the issues associated with the pending Motion and in order that justice be done. Counsel for both Parties have conferred. Accordingly, the Parties jointly request that the Court grant the foregoing Motion and enter an Order staying the case with respect to Lyft and extending AGIS's deadline to file its objections and motion for reconsideration.

Dated: November 24, 2021

Respectfully submitted,

/s/ Vincent J. Rubino, III

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 24, 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/ Vincent J. Rubino, III*  
\_\_\_\_\_  
Vincent J. Rubino, III

**CERTIFICATE OF CONFERENCE**

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

*/s/ Vincent J. Rubino, III*  
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Vincent J. Rubino, III