

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

JAWBONE INNOVATIONS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

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Case No. 2:21-CV-00186-JRG

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND  
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Plaintiff Jawbone Innovations, LLC ("Jawbone" or "Plaintiff") moves the Court to extend the time within which Defendants, Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc., Defendants herein, without waiving any defenses described or referred to in Rule 12 F.R.C.P., are required to move, answer, or otherwise respond to Plaintiff's Complaint. In support of their motion, Plaintiff states as follows:

1. On May 27, 2021, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc.
2. On June 16, 2021, Plaintiff served its Complaint upon Samsung Electronics America, Inc. Samsung Electronics Company, Ltd., a foreign entity, has yet to be served.
3. Counsel for Defendants has agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd., a foreign entity, in exchange for a 90-day extension for all defendants to answer or otherwise plead by October 5, 2021.

4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Plaintiff Jawbone Innovations, LLC respectfully requests that the time in which Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. are required to move, answer or otherwise respond to Plaintiff's Complaint be extended up to and including October 5, 2021.

Dated: June 24, 2021

Respectfully submitted,

/s/ Alfred R. Fabricant

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**ATTORNEYS FOR PLAINTIFF  
JAWBONE INNOVATIONS, LLC**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel have complied with the meet and confer requirements of Local Rule 7(h) and this motion is unopposed.

/s/ Alfred R. Fabricant  
Alfred R. Fabricant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on June 24, 2021 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Alfred R. Fabricant  
Alfred R. Fabricant