

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.*

CASE NO. 2:21-cv-00186-JRG

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (together, “Samsung”) move the Court to extend by 30 days the time for Samsung, without waiving any defenses under Fed. R. Civ. P. 12, to move, answer, or otherwise respond to the amended complaint filed by Plaintiff Jawbone Innovations, LLC (“Plaintiff”) on October 26, 2021 (Dkt. 21). Plaintiff does not oppose the relief requested by Samsung’s motion. In support of its motion, Samsung states as follows:

1. On October 5, 2021, Samsung filed its answer to the original complaint, and counterclaimed for declaratory judgment of non-infringement and invalidity of the two asserted patents. Dkt. 17.

2. On October 26, 2021, Plaintiff filed an amended complaint, alleging infringement of the two originally asserted patents plus five additional patents (U.S. Patent Nos. 7,246,058, 8,467,543, 8,503,691, 10,779,080, and 11,122,357), for a total of seven patents now asserted against Samsung. Dkt. 21.

3. Samsung had no prior notice of this amendment nor otherwise of Plaintiff's intent to assert the five additional patents.

4. Samsung subsequently conferred with Plaintiff regarding an extension to the 14-day period to respond to an amended complaint to, among other things, allow Samsung to digest and understand the new allegations.

5. Plaintiff agreed to a 30-day extension.

6. Accordingly, Samsung hereby requests the Court extend the response deadline by 30 days, *i.e.*, from November 9, 2021 to December 9, 2021.

WHEREFORE, Samsung respectfully requests that the time in which it is required to move, answer, or otherwise respond to Plaintiff's amended complaint be extended up to and including December 9, 2021.

Dated: October 29, 2021

Respectfully submitted,

/s/Ryan M. Nishimoto

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**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/Ryan M. Nishimoto

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 29, 2021, the foregoing document was electronically filed with the Clerk of the Court for the Eastern District of Texas using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

/s/Ryan M. Nishimoto