

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

ADVANCED MICRO DEVICES, INC.; and ATI
TECHNOLOGIES ULC,

Plaintiffs,

v.

TCL INDUSTRIES HOLDINGS CO., LTD.; TCL
INDUSTRIES HOLDINGS (H.K.) LIMITED;
TCL ELECTRONICS HOLDINGS LIMITED;
TCL TECHNOLOGY GROUP CORPORATION;
TTE CORPORATION; TCL HOLDINGS (BVI)
LIMITED; TCL KING ELECTRICAL
APPLIANCES (HUIZHOU) CO. LTD.;
SHENZHEN TCL NEW TECHNOLOGIES CO.,
LTD.; TCL MOKA INTERNATIONAL
LIMITED; TCL SMART DEVICE (VIETNAM)
CO., LTD; MANUFACTURAS AVANZADAS
SA DE CV; TCL ELECTRONICS MEXICO, S
DE RL DE CV; TCL OVERSEAS MARKETING
LTD.; and REALTEK SEMICONDUCTOR
CORP.,

Defendants.

C. A. NO. 2:22-CV-00134

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND DEADLINES TO MOVE TO STAY AND TO SERVE
INFRINGEMENT AND INVALIDITY CONTENTIONS**

Plaintiffs Advanced Micro Devices, Inc. and ATI Technologies ULC (collectively, “AMD”) and Defendants TCL Industries Holdings Co. Ltd., TCL Industries Holdings (H.K.) Limited, TCL Electronics Holdings Limited, TCL Technology Group Corporation, TTE Corporation, TCL Holdings (BVI) Limited, TCL King Electrical Appliances (Huizhou) Co. Ltd., Shenzhen TCL New Technologies Co., Ltd.—correct name TCL New Technology Co., Ltd.—, TCL MOKA International Limited, and TCL Smart Device (Vietnam) Co., Ltd, Manufacturas

Avanzadas SA de CV, TCL Electronics Mexico, S de RL de CV, and TCL Overseas Marketing Ltd. (collectively, “TCL”) have reached an agreement to extend certain deadlines in the instant action, and AMD and TCL hereby seek an order by the Court entering the AMD’s and TCL’s agreement as follows:

I.

On May 5, 2022, AMD filed the Complaint in this action (Dkt. 1). AMD filed a parallel investigation in the United States International Trade Commission, which was instituted on June 1, 2022, *In re Matter of Certain Graphics Systems, Components Thereof, and Digital Televisions Containing the Same*, No. 337-TA-1318. Pursuant to 28 U.S.C. § 1659(a), TCL has a right to seek a mandatory stay of this action due to the parallel ITC Investigation up to and through July 1, 2022.

II.

On June 14, 2022, the Court set a scheduling conference for this case, which is scheduled to occur on July 19, 2022 (Dkt. 18 (“Order”)). Pursuant to the Order, the deadline for AMD to comply with P.R. 3-1 and 3-2 (Infringement Contentions) is July 5, 2022 and the deadline for TCL to comply with P.R. 3-3 and 3-4 (Invalidity Contentions) and to comply with the Standing Order Regarding Subject-Matter Eligibility Contentions is August 30, 2022.

III.

AMD and TCL agree that extensions are appropriate for the foregoing deadlines to seek a stay of present proceeding and to serve substantive contentions in order to allow parallel proceedings to move forward in the ITC Investigation, and to give the parties further time to determine whether a stay of this case is appropriate.

IV.

AMD and TCL request the Court to enter an order extending the foregoing deadlines as

follows:

- That the deadline for TCL to seek a mandatory stay of this case be extended by three weeks to July 22, 2022, a motion on which AMD will join TCL if filed by the extended deadline;
- That the deadline for AMD to comply with P.R. 3-1 and 3-2 (Infringement Contentions) be extended by three weeks to July 26, 2022;
- That the deadline for TCL to comply with P.R. 3-3 and 3-4 (Invalidity Contentions) and to comply with the Standing Order Regarding Subject-Matter Eligibility Contentions be extended by three weeks to September 20, 2022.

Current Deadline	New Deadline	Description
July 1, 2022	July 22, 2022	Deadline for TCL to seek a mandatory stay of this case
July 5, 2022	July 26, 2022	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)
August 30, 2022	September 20, 2022	Comply with P.R. 3-3 & 3-4 (Invalidity Contentions)
August 30, 2022	September 20, 2022	Comply with Standing Order Regarding Subject-Matter Eligibility Contentions

V.

The Parties do not file this Joint Motion for the purpose of delay, but rather to allow the Parties to adequately address the issues associated with the pending Contentions and in order that justice be done.

Dated: July 1, 2022

Respectfully submitted,

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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 the parties jointly request the relief sought herein.

/s/ Eric H. Findlay
Eric H. Findlay

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 1, 2022 on all counsel of record, via the Court's CM/ECF system.

/s/ Eric H. Findlay

Eric H. Findlay