## 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-JRG-RSP JURY TRIAL DEMANDED

## JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED PROTECTIVE ORDER

COME NOW, Plaintiffs Advanced Micro Devices, Inc. and ATI Technologies ULC (collectively, "AMD") and Defendant Realtek Semiconductor Corp. ("Realtek") and show the Court as follows:

The current deadline for the Parties to submit a Proposed Protective Order with statement of disputed positions, and Initial and Additional Disclosures is September 2, 2022. The parties are proceeding to exchange Initial and Additional Disclosures today, September 2, 2022.

The Parties have exchanged drafts of proposed protective order provisions but respectfully



request additional time to meet and confer and narrow any remaining differences and disputes. The Parties respectfully request a brief two (2) business day extension of this deadline up to and including September 7, 2022. The Parties will not request any further extensions on the submission of a proposed protective order and disputed portions thereof.

Dated: September 2, 2022

By: /s/ Eric H. Findlay

Eric H. Findlay

State Bar No. 00789886

Brian Craft

State Bar No. 04972020

FINDLAY CRAFT, P.C.

102 N. College Ave. Suite 900

Tyler, Texas 75702

Tel: (903) 534-1100

Fax: (903) 534-1137

Email: efindlay@findlaycraft.com

Email: bcraft@findlaycraft.com

Michael T. Renaud

James M. Wodarski

Michael J. McNamara

Adam S. Rizk

Samuel F. Davenport

William A. Meunier

Marguerite McConihe

Matthew A. Karambelas

Catherin Xu

Nana Liu

Tianyi Tan

MINTZ LEVIN COHN FERRIS

GLOVSKY AND POPEO PC

One Financial Center

Boston, MA 02111

617-542-6000

Jonathan J. Engler
MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO PC
555 12th Street NW, Suite 1100
Washington, DC 20004
202-434-7446

Respectfully submitted,

By: /s/ J. Mark Mann

J. Mark Mann

State Bar No. 12926150

G. Blake Thompson

State Bar No. 24042033

MANN | TINDEL | THOMPSON

201 E. Howard Street

Henderson, Texas 75654

Tel: (903) 657-8540

Fax: (903) 657-6003

Email: Mark@TheMannFirm.com Email: Blake@TheMannFirm.com

Attorneys for Defendant Realtek

Semiconductor Corp.



Attorneys for Plaintiffs ATI Technologies ULC and Advanced Micro Devices, Inc.

## **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for the Parties met and conferred and this motion is joint.

/s/ Eric H. Findlay Eric H. Findlay

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2022, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Eric H. Findlay
Eric H. Findlay

