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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

Case No. 2:22-cv-0185-JRG

v.

**JURY TRIAL DEMANDED** 

VERIZON COMMUNICATIONS INC. and CELLCO PARTNERSHIP, d/b/a VERIZON WIRELESS,

Defendants.

## UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLY WITH P.R. 3-3 AND 3-4

Defendants file this Unopposed Motion for Extension of Time to comply with P.R. 3-3 and 3-4, and shows the Court as follows: Defendants' counsel has had some family-related issues over the past several weeks and need additional time to gather documents and draft invalidity contentions and subject-matter eligibility contentions.

The current deadline to comply with P.R. 3-3 and 3-4 is November 7, 2022 and Defendants have requested, and AGIS has agreed to: (1) a two-week extension of this deadline to comply with P.R. 3-4(a), and (2) a four-week extension of this deadline to comply with P.R. 3-3 and 3-4(b) and to comply with the Standing Order Regarding Subject-Matter Eligibility Contentions. The new deadlines would be November 21, 2022 and December 5, 2022 respectively.

Original Dates	<b>Amended Dates</b>	Event
November 7, 2022	December 5, 2022	Comply with Standing Order Regarding Subject- Matter Eligibility Contentions
November 7, 2022	December 5, 2022	Comply with P.R. 3-3 (Invalidity Contentions) and P.R. 3-4(b)



Original Dates	<b>Amended Dates</b>	Event
November 7, 2022	November 21, 2022	Comply with P.R. 3-4(a)

Wherefore, Defendants respectfully request that the Court extend (1) the deadline for Defendants to comply with P.R. 3-4(a) up to and including November 21, 2022 and (2) the deadlines for Defendants to comply with P.R. 3-3 and 3-4(b) and to comply with the Standing Order Regarding Subject-Matter Eligibility Contentions up to and including December 5, 2022. The Parties are not proposing to change any other deadlines and stipulate to the Proposed First Amended Docket Control Order, which is attached hereto.

Dated: November 3, 2022 Respectfully submitted,

By: /s/ Deron Dacus

Deron Dacus ddacus@dacusfirm.com THE DACUS FIRM, PC 821 EDE Loop 323, Suite 430 Tyler, TX 75701

Tel: 903-705-1117 Fax: 903-581-2543

Holly Engelmann
TX Bar No. 24040865
HEngelmann@duanemorris.com
DUANE MORRIS LLP
100 Crescent Court, Suite 1200
Dallas, TX 75201

Tel: 214-257-7200 Fax: 214-257-7201

Kevin P. Anderson KPAnderson@duanemorris.com DUANE MORRIS LLP 595 9th Street, N.W., Suite 1000 Washington, DC 20004-2166

Tel: 202-776-5213 Fax: 202-315-3169

Attorneys for Defendants



## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Plaintiff's counsel of record was served with a true and correct copy of the foregoing document by the CM/ECF system on November 3, 2022.

/s/ Deron Dacus

## **CERTIFICATE OF CONFERENCE**

Counsel for Defendants conferred with Counsel for Plaintiff and counsel for Plaintiff confirmed that Plaintiff does not oppose the relief requested in this motion.

/s/ Deron Dacus	
-----------------	--

