

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 2:22-cv-00263-JRG-RSP
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD.,	§	
ET AL.,	§	
Defendants.	§	
	§	
	§	

**JOINT MOTION TO EXTEND THE PARTIAL STAY OF ALL DEADLINES
OF CLAIMS INVOLVING GOOGLE PRODUCTS**

Plaintiff AGIS Software Development LLC (“Plaintiff” or “AGIS”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung) (Plaintiff and Defendants, collectively, the “Parties”) have met and conferred and jointly submit this request to extend the stay of all unreached case deadlines for the subset of claims and issues involving Google products.

On January 15, 2024, the Court granted the Parties’ request for a partial stay of all unreached deadlines involving Google Products, including but not limited to Find My Device, in this matter until February 12, 2024 to allow the Parties to submit dismissal papers. Dkt. 176. The parties understand that AGIS and a third-party, Google LLC, have finalized a settlement agreement with respect to claims and issues involving Google products and expect to fully execute the agreement next week, and then file dismissal papers as to those claims by no later than February 28, 2024. Accordingly, the Parties respectfully request an extension of the stay of these proceedings with respect to claims and issues involving Google products to continue through to February 28, 2024.



Accordingly, the Parties jointly move the Court to extend the stay of all deadlines in the case with respect to claims and issues involving Google products until February 28, 2024 to allow for execution of AGIS's settlement agreement with Google LLC and for related dismissal papers to be submitted. This stay extension is not sought for the purpose of delay, but so that justice may be served.

Dated: February 12, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

Justin Kurt Truelove

State Bar No. 24013653

Email: kurt@truelovelawfirm.com

TRUELOVE LAW FIRM, PLLC

100 West Houston Street

Marshall, Texas 75670

Telephone: (903) 938-8321

Facsimile: (903) 215-8510

***ATTORNEYS FOR PLAINTIFF AGIS
SOFTWARE DEVELOPMENT LLC***

/s/ Mark Liang (with permission)

Neil P. Sirota

Email: neil.sirota@bakerbotts.com

Margaret M. Welsh

Email: margaret.welsh@bakerbotts.com

Robert L. Maier

NY Bar No. 4123246

Email: Robert.maier@bakerbotts.com

BAKER BOTTS L.L.P.

30 Rockefeller Plaza

New York, NY 10112-4498

Telephone: (212) 408-2500

Facsimile: (212) 408-2501

Megan LaDriere White

State Bar No. 24083348

Email: megan.white@bakerbotts.com

BAKER BOTTS L.L.P.

2001 Ross Avenue, Suite 900

Dallas, Texas 75201

Telephone: (214) 953-6500

Facsimile: (214) 953-6501

Tom Gorham

State Bar No. 24012715

tom@gillamsmithlaw.com

Melissa R. Smith

State Bar No. 24001351

melissa@gillamsmithlaw.com

GILLAM & SMITH LLP

303 South Washington Avenue

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Gregory Blake Thompson

State Bar No. 24042033

MANN | TINDEL | THOMPSON

112 E. Line Street, Suite 304

Tyler, Texas 75702

(903) 657-8540

(903) 657-6003 (fax)

Darin W. Snyder (pro hac vice)

dsnyder@omm.com

Mark Liang (pro hac vice)

mliang@omm.com

Bill Trac

btrac@omm.com

Sorin Zaharia

zaharia@omm.com

O'MELVENY & MYERS LLP

Two Embarcadero Center, 28th Floor

San Francisco, CA 94111

Telephone: (415) 984-8700

Facsimile: (415) 984-8701

Stacy Yae (pro hac vice)

syae@omm.com

O'MELVENY & MYERS LLP

400 South Hope Street, 18th Floor

Los Angeles, CA 90071

Telephone: (213) 430-6000

Facsimile: (213) 430-6407

Cason Cole

State Bar No. 24109741

ccole@omm.com

Grant Gibson

State Bar No. 24117859

ggibson@omm.com

O'MELVENY & MYERS LLP

2501 North Harwood Street, Suite 1700

Dallas, TX 75201-1663

Telephone: (972) 360-1900

Facsimile: (972) 360-1901

***ATTORNEYS FOR DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 12, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff has met and conferred with counsel for Defendants, and the parties have agreed to the proposed order submitted herewith.

/s/ Alfred R. Fabricant
Alfred R. Fabricant