

**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. and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	
	§	

**OPPOSED MOTION FOR EXPEDITED BRIEFING FOR
PLAINTIFF'S MOTION TO AMEND P.R. 4-3 DISCLOSURES**

Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”) respectfully moves the Court to Expedite Briefing relative to its Motion for Leave to Amend P.R. 4-3 Disclosures. Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. have indicated that they oppose this Motion.

AGIS seeks an expedited briefing schedule because of the pending deadline for AGIS’s Opening Claim Construction Briefing in accordance with the Court’s First Amended Docket Control Order. Dkt. 66. AGIS seeks leave to add a dispute that was confirmed after the parties filed their P.R. 4-3 Disclosures concerning a disagreement over the interpretation and scope of the term “participants” within the agreed construction of the term “group” to mean “more than two participants associated together.” AGIS submits that the Court and the Parties would benefit from efficiencies of adding the dispute term to the current schedule of claim construction briefing. This motion to expedite would permit the Court receive Defendants’ opposition for consideration ahead of the July 21, 2023 deadline for Plaintiff’s P.R. 4-5(a) Opening Claim Construction Brief. Accordingly, AGIS respectfully requests that the Court order Defendants to respond to AGIS’s Motion for Leave within five (5) business days and that there shall be no reply or sur-reply.

Dated: July 11, 2023

Respectfully submitted,

/s/ Alfred R. Fabricant

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 11, 2023, 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 on July 10, 2023, and counsel for Defendants have indicated they oppose.

/s/ Alfred R. Fabricant
Alfred R. Fabricant