

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

AGIS SOFTWARE DEVELOPMENT LLC, v. HMD GLOBAL, et al.	Case No. 2:22-cv-00443-JRG (Lead Case)
AGIS SOFTWARE DEVELOPMENT LLC, v. ASUSTEK COMPUTER INC., et al.	Case No. 2:22-cv-00440-JRG (Member Case)
AGIS SOFTWARE DEVELOPMENT LLC, v. PANASONIC CORPORATION, et al.	Case No. 2:22-cv-00447-JRG (Member Case)
AGIS SOFTWARE DEVELOPMENT LLC, v. SONY CORPORATION, et al.	Case No. 2:22-cv-00448-JRG (Member Case)

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant Sony Corporation, formerly known as Sony Mobile Communications, Inc. (“Sony”)¹ hereby moves for an extension of time for Sony to respond to the Complaint filed by AGIS on November 18, 2022 (Dkt. No. 1).²

¹ While AGIS’s complaint identifies Sony Corporation and Sony Mobile Communications, Inc. as separate defendants, Sony Mobile Communications, Inc. and other Sony entities were integrated into one company named “Sony Corporation” as of April 1, 2021.

² Sony understands that corresponding motions are being filed in Civil Action Nos. 2-22-cv-00440 (*AGIS Software Development LLC v. ASUStek Computer Inc. et al*); 22-cv-00443 (*AGIS Software Development LLC v. HMD Global et al*); and 2-22-cv-00447 (*AGIS Software Development LLC v. Panasonic Corporation et al*). These cases involve the same asserted patents and, as with the

On January 25, 2023, the case was stayed pending a final determination in *In the Matter of Certain Location-Sharing Systems, Related Software Components Thereof, and Products Containing Same* (ITC Inv. No. 337-TA-1347) (Dkt. No. 13). On October 13, 2023, the parties filed a joint notice informing the Court of the termination of that investigation (Dkt. No. 14). On October 16, 2023, this Court lifted the stay and ordered Sony to answer or otherwise respond to the Complaint by November 15, 2023 (Dkt. No. 15).

Sony—a foreign corporation organized under the laws of Japan—has not been served with AGIS’s Complaint. However, pursuant to an agreement between the parties, Sony accepted service on October 31, 2023 in exchange for a 60-day extension of time to respond from the November 15, 2023 date originally set by the Court. Accordingly, Sony respectfully requests that the Court move Sony’s deadline to answer or otherwise respond to the Complaint to January 16, 2024. Counsel for AGIS confirmed that they do not oppose the requested relief.

Dated: November 9, 2023

Respectfully submitted,

By: /s/ G. Blake Thompson

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case against Sony, had been stayed pending the ITC investigation. If granted, the motions would result in the Sony, ASUSTek, HMD, and Panasonic defendants all having response deadlines at approximately the same time in January.

CERTIFICATE OF CONFERENCE

I hereby certify that on November 9, 2023, counsel for Sony conferred via email with counsel for AGIS regarding the Motion. Based on that conference, the relief requested herein is unopposed.

/s/ G. Blake Thompson
G. Blake Thompson

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on November 9, 2023 all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ G. Blake Thompson
G. Blake Thompson