| IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION | |
|---|--|
| AGIS SOFTWARE DEVELOPMENT LLC, Plaintiff, v. HMD GLOBAL, ET AL., Defendants. | \$ Case No. 2:22-cv-00443-JRG \$ (LEAD CASE) \$ JURY TRIAL DEMANDED \$ \$ |
| AGIS SOFTWARE DEVELOPMENT LLC, | <pre> §</pre> |
| Plaintiff, v. | § Cube Rol 2.22 ev court site Rol § (MEMBER CASE) § § JURY TRIAL DEMANDED |
| v. PANASONIC CORPORATION, ET AL., | \$ \$ \$ |
| Defendants. | § § § |

JOINT MOTION FOR STAY OF ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff AGIS Software Development LLC ("Plaintiff" or "AGIS") and Defendant Panasonic Corporation of North America and Panasonic Holdings Corporation¹ (collectively, "Panasonic") (Plaintiff and Defendants, collectively, the "Parties") have met and conferred and jointly submit this request for a stay of all case deadlines.

The Parties hereby notify the Court that AGIS and Panasonic have reached an agreement in principle to settle all remaining claims and counterclaims for relief in this litigation.

¹ AGIS named Panasonic Corporation as a defendant in this lawsuit. However, Panasonic Corporation of North America's parent company is a different Panasonic entity, Panasonic Holdings Corporation.

Accordingly, the Parties jointly move the Court to enter a stay of all deadlines in the case, including as set forth in the Court's Docket Control Order (Dkt. 33), for thirty (30) days to allow the settlement to be finalized and dismissal papers to be submitted. This stay is not sought for the purpose of delay, but so that justice may be served.

Dated: May 21, 2024

DOCKE.

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/ Trey Yarbrough (with permission)

Trey Yarbrough Bar No. 22133500 Email: trey@yw-lawfirm.com **YARBROUGH WILCOX, PLLC** 100 E. Ferguson, Suite 1015 Tyler, Texas 75702 Telephone: 903-595-3111 Facsimile: 903-595-0191

Michael J. Kasdan Joseph M. Casino **WIGGIN AND DANA, LLP** 437 Madison Avenue, 35th Floor New York, NY 10022 Telephone: 212.551-2603 Facsimile: 212.551.2888

ATTORNEY FOR DEFENDANTS PANASONIC HOLDINGS CORPORATION AND PANASONIC CORPORATION OF NORTH AMERICA

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on May 21, 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 Defendant, and the parties have agreed to the proposed order submitted herewith.

/s/ Alfred R. Fabricant Alfred R. Fabricant