## 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.	<pre>\$     Case No. 2:22-cv-00443-JRG     (LEAD CASE)  \$     JURY TRIAL DEMANDED  \$     \$</pre>
AGIS SOFTWARE DEVELOPMENT LLC,  Plaintiff,  v.  PANASONIC CORPORATION, ET AL.,  Defendants.	\$ Case No. 2:22-cv-00447-JRG-RSP \$ (MEMBER CASE) \$ JURY TRIAL DEMANDED \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$

# JOINT MOTION FOR FIRST EXTENSION OF STAY OF ALL DEADLINES PENDING SETTLEMENT

Plaintiff AGIS Software Development LLC ("Plaintiff" or "AGIS") and Defendants Panasonic Corporation of North America and Panasonic Holdings Corporation (collectively, "Panasonic" or "Defendants") (Plaintiff and Defendants, collectively, the "Parties") file this Joint Motion for First Extension of Stay of all Deadlines Pending Settlement.

<sup>&</sup>lt;sup>1</sup> 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.



The Parties respectfully notify the Court that all matters in controversy between the Parties in this case have been settled in principle. On May 21,2024 AGIS filed a Joint Motion to Stay All Deadlines and provided notice of settlement (Dkt. 54). On May 28,2024 this Court stayed the case for thirty (30) days until June 27, 2024 (Dkt. 55) while the Parties worked on a settlement agreement.

The Parties are in the process of formalizing the settlement agreement, and respectfully and jointly request that the Court extend the stay of all case deadlines between AGIS and Panasonic for an additional thirty (30) days to allow the Parties to finalize the settlement documents. The additional time is needed to have representatives of the Parties confirm/execute the settlement documents, and to file dismissal documents with the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: June 25, 2024 Respectfully submitted,

/s/ Alfred R. Fabricant

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on June 25, 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

