

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

INVENSYS SYSTEMS, INC.,	§	
	§	
Plaintiff,	§	C.A. No.: 6:12-cv-00799-LED
v.	§	
	§	JURY TRIAL DEMANDED
EMERSON ELECTRIC CO. and	§	
MICRO MOTION INC., USA,	§	
	§	
Defendants.	§	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO DEFENDANT MICRO MOTION, INC.’S
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Plaintiff Invensys Systems, Inc. (“Invensys”) respectfully requests a two-week extension until February 11, 2013, to file its response to Defendant Micro Motion, Inc.’s (“Micro Motion”) Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (ECF No. 14). This request is made due to (among other things) international travel by Invensys’s in-house counsel for an extended period. This request for an extension is not sought for purposes of delay and will not affect any other case deadlines. Counsel for Invensys has conferred with counsel for Micro Motion regarding the relief requested in this motion, and Micro Motion is not opposed to Invensys’s requested extension.

Accordingly, Invensys respectfully requests that the Court extend the date for Invensys to file its response to Micro Motion’s Motion to Transfer Venue until February 11, 2013.

Date: January 24, 2013

Respectfully submitted,

/s/ Claudia Wilson Frost

Claudia Wilson Frost
State Bar No. 21671300
Jeffrey L. Johnson
State Bar No. 24029638
Amy P. Mohan
State Bar No. 24051070

DLA PIPER LLP

1000 Louisiana, Suite 2800
Houston, TX 77002
Telephone: 713.425.8400
Facsimile: 713.425.8401
Claudia.Frost@dlapiper.com
Jeffrey.Johnson@dlapiper.com
Amy.Mohan@dlapiper.com

ATTORNEYS FOR PLAINTIFF, INVENSYS
SYSTEMS, INC.

OF COUNSEL:

Nicholas G. Papastavros
Daniel Rosenfeld
DLA PIPER LLP
33 Arch Street, 26th Floor
Boston, MA 02110
Telephone: 617.406.6000
Facsimile: 617.406.6100
Nick.Papastavros@dlapiper.com
Daniel.Rosenfeld@dlapiper.com

ATTORNEYS FOR PLAINTIFF,
INVENSYS SYSTEMS, INC.

CERTIFICATE OF CONFERENCE

I hereby certify that we have conferred with opposing counsel for Defendant Micro Motion, Inc., and they are not opposed to the relief requested in this motion.

/s/ Claudia Wilson Frost
Claudia Wilson Frost

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on January 24, 2013, pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Claudia Wilson Frost
Claudia Wilson Frost