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

	§ §	
CELLULAR COMMUNICATIONS	§	
EQUIPMENT LLC,	§	
	§	
Plaintiff,	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	
	§	CIVIL A CITIONING C 14 000
v.	§	CIVIL ACTION NO. 6:14-cv-982
	\$ \$ \$	JURY TRIAL DEMANDED
	§	
LG ELECTRONICS, INC.,	§	
LG ELECTRONICS U.S.A., INC.,	§	
AT&T INC.,	§	
AT&T MOBILITY LLC,	§	
VERIZON COMMUNICATIONS, INC.,	§	
CELLCO PARTNERSHIP D/B/A VERIZON	§	
WIRELESS,	§	
SPRINT NEXTEL CORPORATION,	& & & &	
SPRINT SOLUTIONS, INC.,		
SPRINT SPECTRUM L.P.,	§	
BOOST MOBILE, LLC,	§	
T-MOBILE USA, INC., and	§	
T-MOBILE US, INC.,	8	
	on on on on on on on	
Defendants.	§	

## PLAINTIFF'S UNOPPOSED MOTION ON BEHALF OF ALL DEFENDANTS TO EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiff respectfully moves the Court for an extension of time for all Defendants in this action to respond to Plaintiff's Complaint. Pursuant to an agreement between Defendant LG Electronics U.S.A., Inc. and Plaintiff concerning service of its foreign parent, LG Electronics, Inc., Plaintiff has agreed to an extension of ninety (90) days.

The current deadline for Defendants to move, answer, or otherwise respond to Plaintiff's Complaint is January 20, 2015. On behalf of Defendants, Plaintiff requests that the Court enter



an Order extending their deadline to move, answer, or otherwise respond to Plaintiff's Complaint until and including April 20, 2015. This extension is not meant for improper delay of this proceeding. Defendants will use the additional time to retain outside counsel, review the allegations in the Complaint, and draft the appropriate response. Further, the parties will explore whether early resolution is possible.

**Dated: January 19, 2015** 

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF CELLULAR COMMUNICATIONS EQUIPMENT LLC

## **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), I certify that the parties have met and conferred and that this motion is unopposed.

/s/ Edward R. Nelson, III Edward R. Nelson, III

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of January, 2015, I electronically filed the foregoing document with the clerk of the Court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the Court's electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Edward R. Nelson, III Edward R. Nelson, III

