

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

LG ELECTRONICS INC. and LG  
ELECTRONICS U.S.A., INC.,

Defendants.

CIVIL ACTION NO. 6:19-CV-00384

JURY TRIAL DEMANDED

ANCORA TECHNOLOGIES, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

CIVIL ACTION NO. 6:19-CV-00385

JURY TRIAL DEMANDED

**PLAINTIFF'S NOTICE OF READINESS**

Plaintiff Ancora Technologies, Inc. ("Ancora") submits this Notice of Readiness and respectfully requests a joint case management conference in the above captioned matters.

On June 21, 2019, Ancora filed its Complaint against Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") alleging infringement of U.S. Patent No. 6,411,941 ("the '941 Patent"). Samsung appeared through counsel and filed their Answer on October 1, 2019.

Also on June 21, 2019, Ancora filed its Complaint against LG Electronics Inc. and LG Electronics U.S.A., Inc. (collectively, "LG") alleging infringement of the '941 Patent. LG appeared through counsel and filed their Answer on October 25, 2019.

The two matters involve the same plaintiff, Ancora, and the same patent. Accordingly, it will be both in the interest of justice and more efficient for all parties involved to consolidate these matters for claim construction, discovery, and any other pre-trial matters the Court deems fit to address jointly between the two cases. Ancora thus respectfully requests a joint case management conference with Samsung and LG within the next 30 days, if available.

Dated: October 28, 2019

Respectfully submitted,

By: /s/ Charles L. Ainsworth

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**COUNSEL FOR PLAINTIFF ANCORA**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of October 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Charles L. Ainsworth

Charles L. Ainsworth