

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

STRATOSAUDIO INC.,

Plaintiff,

v.

HYUNDAI MOTOR AMERICA,

Defendant.

Case No. 6:20-cv-01125-ADA

JURY TRIAL DEMANDED

STRATOSAUDIO INC.,

Plaintiff,

v.

MAZDA MOTOR OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-1126-ADA

JURY TRIAL DEMANDED

STRATOSAUDIO INC.,

Plaintiff,

v.

SUBARU OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-1128-ADA

JURY TRIAL DEMANDED

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLVO CARS USA, LLC,

Defendant.

Case No. 6:20-cv-1129-ADA

JURY TRIAL DEMANDED

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLKSWAGEN GROUP OF
AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01131-ADA

JURY TRIAL DEMANDED

[PROPOSED] ORDER REGARDING DISCOVERY DISPUTE

The parties in the above-captioned cases alerted the Court to a discovery dispute over whether Plaintiff should be granted leave to amend its Preliminary Infringement Contentions to supplement its disclosures regarding the claimed dates of invention for the asserted patents. A hearing was held on October 7, 2021. For the reasons stated at the hearing:

It is **ORDERED** that Plaintiff's motion for leave to amend its Preliminary Infringement Contentions is **GRANTED**. To the extent it has not already done so, Plaintiff must provide Defendants with documents regarding its claimed dates of invention.

It is further **ORDERED** that the deadline for Defendants to disclose final invalidity contentions is extended to January 28, 2022.

SIGNED this _____ day of _____, 2021

ALAN D ALBRIGHT
UNITED STATES DISTRICT JUDGE

AGREED:

Dated: October 14, 2021

Dated: October 14, 2021

/s/ Jonathan J. Lamberson

WHITE & CASE LLP
Jonathan J. Lamberson (*admitted pro hac vice*)
CA Bar No. 239107
Henry Huang (*admitted pro hac vice*)
CA Bar No. 252832
2 Palo Alto Square,
3000 El Camino Real, #900
Palo Alto, CA 94306
Tel: 650-213-0300
Fax: 650-213-8158
lamberson@whitecase.com
henry.huang@whitecase.com

WHITE & CASE LLP
Michael Songer (*admitted pro hac vice*)
D.C. Bar No. 453727
701 Thirteenth Street, NW
Washington DC, 20005
Tel: 202-626-3600
Fax: 202-639 9355
michael.songer@whitecase.com

WHITE & CASE LLP
Charles Larsen (*admitted pro hac vice*)
MA Bar No. 652355
Daniel S. Sternberg (*admitted pro hac vice*)
MA Bar No. 688842
75 State Street
Boston, MA 02109
Tel: 617-979-9300
Fax: 817-334-0401
charles.larsen@whitecase.com
dan.sternberg@whitecase.com

FRIEDMAN, SUDER & COOKE
Corby R. Vowell
Texas Bar No. 24031621
604 East 4th Street, Suite 200
Fort Worth, TX 76102
Tel: 817-334-0400
Fax: 817-334-0401
vowell@fsclaw.com

Attorneys for Plaintiff StratosAudio, Inc.

/s/ Clarence A. Rowland

O'MELVENY & MYERS LLP
Ryan K. Yagura
(TX Bar No. 24075933)
Nicholas J. Whilt (*pro hac vice*)
CA Bar No. 247738
Clarence A. Rowland (*pro hac vice*)
CA Bar No. 285409
400 S. Hope Street
Los Angeles, CA 90071
Tel.: 213-430-6000
Fax: 213-430-6407
Email: ryagura@omm.com
nwhilt@omm.com
crowland@omm.com

*Attorneys for Defendant Hyundai
Motor America*

/s/ Lewis E. Hudnell, II

HUDNELL LAW GROUP P.C.
Lewis E. Hudnell, III
lewis@hudnelllaw.com
800 W. El Camino Real Suite 180
Mountain View, California 94040
T: 650.564.3698
F: 347.772.3034

*Attorneys for Defendant Volvo Cars
USA, LLC*

/s/ Paul R. Steadman

DLA PIPER LLP (US)

John M Guaragna
Texas Bar No 24043308
401 Congress Avenue, Suite 2500
Austin, TX 78701-3799
Tel: 512.457.7125
Fax: 512.457.7001
john.guaragna@us.dlapiper.com

Paul R. Steadman (*Pro Hac Vice*)
Illinois Bar No. 6238160
paul.steadman@dlapiper.com
Matthew Satchwell (*Pro Hac Vice*)
Illinois Bar No. 6290672
matthew.satchwell@dlapiper.com
Stephanie Lim (*Pro Hac Vice*)
Illinois Bar No. 6324246
stephanie.lim@dlapiper.com
Robert Groselak (*Pro Hac Vice*)
Illinois Bar No. 6332753
DLA PIPER LLP (US)
444 West Lake Street, Suite 900
Chicago, IL 60606
Telephone: (312) 368-4000
Facsimile: (312) 236-7516

Sangwon Sung (*Pro Hac Vice*)
California Bar No. 309380
sangwon.sung@dlapiper.com
DLA PIPER LLP (US)
2000 University Avenue
East Palo Alto, CA 94303
Telephone: (650) 833-2000
Facsimile: (650) 833-2001

*Attorneys for Defendants
Mazda Motor of America, Inc. and Subaru
of America, Inc.*

/s/ Mark Hannemann

SHEARMAN & STERLING LLP

David P. Whittlesey
300 W. 6th Street, Suite 2250
Austin, Texas 78701
Telephone: 512.647.1907
Facsimile: 512.857.6602
David.Whittlesey@shearman.com

Mark Hannemann
599 Lexington Avenue
New York, NY 10022
Telephone: 212.848.7696
Facsimile: 646.848.7696
Mark.Hannemann@shearman.com

Thomas R. Makin
599 Lexington, Avenue
New York, NY 10022
Telephone: 212.848.7698
Facsimile: 646.8487698
Thomas.Makin@shearman.com

*Attorneys for Defendant Volkswagen
Group of America, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that on October 14, 2021, counsel of record for this case are being served through the Court's ECF system.

/s/ Jonathan J. Lamberson
Jonathan J. Lamberson