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

GESTURE TECHNOLOGY PARTNERS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:21-cv-00121-ADA

**JURY TRIAL DEMANDED** 

## JOINT NOTICE OF VENUE AND JURISDICTIONAL DISCOVERY REGARDING APPLE INC.'S OPPOSED MOTION TO TRANSFER VENUE

Plaintiff Gesture Technology Partners, LLC ("GTP" or "Plaintiff") and Defendant Apple Inc. ("Apple" or "Defendant") file this Joint Notice of Venue and Jurisdictional Discovery Regarding Apple Inc.'s Opposed Motion to Transfer Venue Pursuant To 28 U.S.C. § 1404(a) (Dkt. No. 21) (the "Motion to Transfer"), as follows:

Defendant filed the Motion to Transfer on July 30, 2021. Under the governing rules, GTP's response would be due on August 13, 2021. However, GTP has notified Defendant that, in order to adequately respond to the Motion to Transfer, it intends to conduct venue and jurisdictional discovery in accordance with the Court's Amended Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases dated June 8, 2021 (the "Standing Order"). Venue and jurisdictional discovery will end on November 1, 2021, and Plaintiff's Response to Defendants' Motion will be due on November 15, 2021. Defendant' Reply will be due on December 6, 2021. The parties will attempt to agree concerning the scope for venue and jurisdictional discovery. If they are unable to do so, they will seek a telephonic conference with the Court pursuant to the Standing Order.



Dated: August 13, 2021 Respectfully submitted,

By: /s/ Fred I. Williams
Fred I. Williams
Texas State Bar No. 00794855
Michael Simons
Texas State Bar No. 24008042
WILLIAMS SIMONS & LANDIS PLLC
327 Congress Ave., Suite 490
Austin, TX 78701
Tel: 512-543-1354
fwilliams@wsltrial.com
msimons@wsltrial.com

Todd E. Landis State Bar No. 24030226 WILLIAMS SIMONS & LANDIS PLLC 2633 McKinney Ave., Suite 130 #366 Dallas, TX 75204 Tel: 512-543-1357 tlandis@wsltrial.com

John Wittenzellner Pennsylvania State Bar No. 308996 WILLIAMS SIMONS & LANDIS PLLC 1735 Market Street, Suite A #453 Philadelphia, PA 19103 Tel: 512-543-1373 johnw@wsltrial.com

Attorneys for Plaintiff Gesture Technology Partners, LLC

/s/ John M. Guaragna
John M. Guaragna
Texas Bar No 24043308
DLA PIPER LLP (US)
303 Colorado Street, Suite 3000
Austin, TX 78701
Phone: (512) 457-7000
john.guaragna@us.dlapiper.com

Sean Cunningham (pro hac vice)



Catherine Huang (pro hac vice) DLA PIPER LLP (US) 401 B Street, Suite 1700 San Diego, CA 92101-4297

Tel: 619.699.2700 Fax: 619.699.2701

sean.cunningham@us.dlapiper.com catherine.huang@us.dlapiper.com

Michael D. Jay (pro hac vice) DLA PIPER LLP (US) 2000 Avenue of the Stars Suite 400 North Tower Los Angeles, CA 90067 Tel: 310 595 3000

Tel: 310.595.3000 Fax: 310.595.3300

michael.jay@us.dlapiper.com

Christopher Deck (*pro hac vice*) DLA PIPER LLP (US) 33 Arch Street, 26th Floor Boston, MA 02110-1447 Tel: 617.406.6000

Fax: 617.406.6100

Attorneys for Defendant Apple Inc.



## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 13, 2021, the undersigned caused a copy of the foregoing document to be served on all counsel of record via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams
Fred I. Williams

## **CERTIFICATE OF CONERENCE**

The undersigned hereby certifies that counsel for Gesture Technology Partners, LLC and counsel for Apple Inc. met and conferred, and all parties agree to filing the foregoing document as a joint notice.

<u>/s/ Fred I. Williams</u> Fred I. Williams

