

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

**DEFENDANT APPLE INC.’S UNOPPOSED MOTION TO EXTEND TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFFS’ COMPLAINT**

Defendant Apple Inc. (“Apple”) hereby moves the Court for an order extending the time for Apple to answer, move, or otherwise respond to Plaintiff Gesture Technology Partner’s (“Plaintiff”) Complaint (Dkt. 1).

The deadline for Apple to answer, move, or otherwise respond to Plaintiffs’ Complaint is currently February 27, 2021. Apple requests an extension of time to answer, move, or otherwise respond to Plaintiff’s Complaint to Monday, March 29, 2021. Plaintiff does not oppose Apple’s request.

The request for extension contained in this motion is the first request by Apple for an extension of time to answer, move, or otherwise respond. The request for an extension is not sought for purposes of delay and will not affect any other case deadlines.

For these reasons, Apple respectfully requests that the Court extend the deadline for Apple to answer, move, or otherwise respond to Plaintiff’s Complaint to Monday, March 29, 2021.

Dated: February 22, 2021

Respectfully submitted,

/s/ John M. Guaragna

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

Michael Jay (*pro hac vice* to be filed)
DLA Piper LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA 90067-4704

Catherine Huang (*pro hac vice* to be filed)
DLA Piper LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297

Christopher Deck (*pro hac vice* to be filed)
DLA Piper LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110-1447

ATTORNEYS FOR DEFENDANT
APPLE INC.

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendant, Apple Inc. conferred by e-mail with Plaintiff's counsel on February 19, 2021. Plaintiff has agreed to Apple's request for an extension of the time to answer, move, or otherwise respond to Plaintiff's Complaint to Monday, March 29, 2021.

/s/ John M. Guaragna

John M. Guaragna

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of February 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ John M. Guaragna
John M. Guaragna