

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-00158-ADA

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND**

Defendant Apple Inc. ("Apple") hereby moves the Court for an order extending the time for Apple to answer, move, or otherwise respond to Maxell, Ltd.'s ("Maxell") Complaint for Patent Infringement (Dkt. 1). The deadline for Apple to answer, move, or otherwise respond to Maxell's Complaint is March 23, 2021. Apple requests a 45-day extension of time to answer, move, or otherwise respond to Maxell's Complaint to May 7, 2021. Maxell has agreed to Apple's request. The request is not sought for purposes of delay and will not affect any other case deadlines. Therefore, Apple respectfully requests that the Court extend the deadline for Apple to answer, move, or otherwise respond to Maxell's Complaint to May 7, 2021.

Dated: March 4, 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@us.dlapiper.com

ATTORNEY FOR DEFENDANT
APPLE INC.

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendant Apple Inc. conferred with Maxell's counsel.
Maxell has agreed to Apple's request sought in this motion.

/s/ John M. Guaragna
John M. Guaragna

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of March 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