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

DEFENDANT NXP USA, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Defendant NXP USA, Inc. ("NXP") hereby moves for an extension of time to file an answer or otherwise respond to Plaintiff's Complaint.

NXP requests a 30 day extension of its deadline to respond to Plaintiff's Complaint from Wednesday, June 1st, 2022, to Friday, July 1, 2022. The parties conferred, and the Plaintiff does not oppose the extension. The extension will serve the interest of justice by providing NXP time to investigate and respond to Plaintiff's Complaint.

For these reasons, Defendants respectfully request that the Court grant this motion and extend to July 1, 2022 the deadline to answer or otherwise respond to Plaintiff's Complaint. A proposed order is attached.



May 27, 2022

Respectfully submitted,

By: /s/ Richard S. Zembek

Richard S. Zembek (SBN 00797726) richard.zembek@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP

Fulbright Tower 1301 McKinney, Suite 5100 Houston, Texas 77010-3095

Tel: (713) 651-5151 Fax: (713) 651-5246

Eric C. Green (SBN 24069824) Eric.green@nortonrosefulbright.com NORTON ROSE FULBRIGHT US LLP 98 San Jacinto Boulevard, Suite 1100 Austin, Texas 78701

Tel: (512) 474-5201 Fax: (512) 536-4598

COUNSEL FOR NXP USA, INC.



CERTIFICATE OF CONFERENCE

I certify that counsel for NXP conferred with counsel for Plaintiff, and counsel for Plaintiff agreed to the extension for Defendants to answer or otherwise respond to Plaintiff's Complaint.

/s/ Richard S. Zembek

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 27, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Richard S. Zembek

