

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

**DODOTS LICENSING SOLUTIONS LLC,**

**Plaintiff,**

**v.**

**SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS  
AMERICA, INC., BEST BUY STORES,  
L.P., BESTBUY.COM, LLC, AND  
BEST BUY TEXAS.COM, LLC,**

**Defendants.**

**Case No. 6:22-cv-00535-ADA-DTG**

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE  
TO EXTEND DEADLINE FOR MOTION TO TRANSFER VENUE**

Pursuant to Federal Rule of Civil Procedure 6(b) and this Court's Standard Order Governing Proceedings 4.2 § VI, Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung"), Best Buy Stores, L.P., Bestbuy.com, LLC, and Best Buy Texas.com, LLC (collectively, "Best Buy") (together, "Defendants") hereby move to seek leave of Court to extend by one week the deadline to file Defendants' Motion to Transfer Venue. Counsel for Plaintiff has indicated that Plaintiff does not oppose this extension request.

Good cause supports the present motion. Plaintiff filed the parties' Case Readiness Status Report on November 29, 2022 in this case, *see* Dkt. 54, and on November 30, 2022 in the related case *DoDots Licensing Solutions LLC v. Apple Inc.*, No 6:22-cv-00533 (W.D. Tex. Nov. 30, 2022), Dkt. 54. These filings established the current Motion to Transfer Venue deadline of January 4, 2022. In the time since this deadline was set, Samsung has diligently attempted to identify the

correct declarant or group of declarants to establish several facts in support of Defendants' Motion to Transfer Venue. These efforts have been slowed due to one of Samsung's intended declarants separating from Samsung and alternative declarant unavailability during the winter holiday season. Defendants therefore seek one additional week to file their Motion to Transfer Venue to ensure the ability to secure the appropriate declarants.

This motion is not brought for the purpose of delay or any other improper purpose. Rather, this motion is presented so that Defendants may fully brief and present the transfer facts for the Court. The undersigned certifies that this extension does not change the date for any hearing, any final submission to the Court related to a hearing, or the trial.

Accordingly, Defendants respectfully present this unopposed request for a one-week extension up to and including January 11, 2023 to file its Motion to Transfer Venue.

Dated: December 29, 2022

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ David M. Hoffman

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**COUNSEL FOR DEFENDANTS,  
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SAMSUNG ELECTRONICS AMERICA, INC.,  
BEST BUY STORES, L.P., BESTBUY.COM, LLC,  
AND BEST BUY TEXAS.COM, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on December 29, 2022, and it was served via CM/ECF on all counsel of record.

*/s/ David M. Hoffman*

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David M. Hoffman