

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC USA, INC., et al.,	§	
Plaintiffs,	§	
	§	Case No. 2:16-cv-00741-JRG
	§	LEAD CASE
	§	
v.	§	Case No. 2:16-cv-00858-JRG
	§	
BIG FISH, INC.,	§	
Defendant.	§	
	§	

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs Uniloc USA, Inc., and Uniloc Luxembourg, S.A. (together, “Uniloc”), and Defendant, Big Fish Games, Inc. (“Big Fish Games”) (together, the “parties”) hereby notify the Court that all matters in controversy between the parties have been settled in principle. As such, the parties jointly move to stay for 30 days (i.e., up to and including Monday, June 14, 2020) all unreached deadlines in the Court’s 6th Amended Docket Control Order (Dkt. 370) so that appropriate dismissal papers may be submitted. If any issues arise in formalizing settlement papers, the parties agree to submit such issues to the Court for final resolution. The parties will notify the Court by email of the general terms and amount of their confidential settlement pursuant to the Court’s Standing Order. A proposed order for the joint motion is attached.

Dated: May 15, 2020

Respectfully submitted,

/s/ Kevin Gannon

Paul J. Hayes

Kevin Gannon

PRINCE LOBEL TYE LLP

One International Place, Suite 3700

Boston, MA 02110
Tel: (617) 456-8000
Email: phayes@princelobel.com
Email: kgannon@princelobel.com

Edward R. Nelson III
ed@nelbum.com
Texas State Bar No. 00797142
Anthony M. Vecchione
anthony@nelbum.com
Texas State Bar No. 24061270
NELSON BUMGARDNER PC
3131 West 7th Street, Suite 300
Fort Worth, TX 76107
Tel: (817) 377-9111
Fax: (817) 377-3485

ATTORNEYS FOR THE PLAINTIFFS

s/ Douglas F. Stewart _____

Douglas F. Stewart
Washington State Bar No. 34068
Jared D. Schuettenhelm
Washington State Bar No. 46181
BRACEWELL LLP
701 Fifth Avenue, Suite 6200
Seattle, WA 98104
Tel: 206-204-6200
Fax: 800-404-3970
doug.stewart@bracewell.com
jared.schuettenhelm@bracewell.com

David J. Ball
New York State Bar No. 4315099
BRACEWELL LLP
1251 Avenue of the Americas
New York, NY 10020
Tel: 212-508-6100
Fax: 800-404-3970
david.ball@bracewell.com

Timothy R. Geiger
Texas State Bar No. 24078552

BRACEWELL LLP
711 Louisiana, Suite 2300
Houston, Texas 77002
Tel: 713-223-2300
Fax: 800-404-3970
tim.geiger@bracewell.com

**ATTORNEYS FOR DEFENDANT BIG FISH
GAMES, INC.**

CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 15, 2020.

/s/ Michael J. Ercolini
Michael J. Ercolini