

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

UNILOC USA, INC. ET AL,
Plaintiffs,
v.

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MOTOROLA MOBILITY LLC,

2:16-cv-00992-JRG
LEAD CASE

SNAP INC.,
Defendants

2:16-cv-00696-JRG
MEMBER CASE

JOINT MOTION FOR EXTENSION

Plaintiffs, Uniloc USA, Inc. and Uniloc Luxembourg, S.A. (together, “Uniloc”) and Defendant Snap Inc. file this Joint Motion for Extension and show as follows:

1. Currently pending before the court are Snap Inc.’s motion to dismiss or transfer venue (Dkt. 35, Member Case) and motion to stay (Dkt. 150, Lead Case). Uniloc’s deadline to respond to both motions is Friday, June 16, 2017.

2. On June 8, 2017, Uniloc noticed depositions of two Snap Inc. employees who Uniloc believes have knowledge relevant to Snap Inc.’s motion to dismiss or transfer venue, among other things. The depositions were noticed for June 21 and June 22.

3. On June 13, 2017, this Court entered an order in *Uniloc USA, Inc. v. Samsung Electronics America, Inc.*, Case No. 2:16-cv—00642-JRG (Dkt. No. 268) (E.D. Tex. June 13, 2017) dismissing all pending motions without prejudice and staying the case pending *Inter Partes Review* (the “IPR”) of certain patents-in-suit, including patents-in-suit in this case.

4. The parties are evaluating how to proceed in light of the June 13, 2017 order.

5. To avoid expense and burdening the court with what may become unnecessary motion practice, while the parties evaluate how to proceed in light of the June 13, 2017 order, Uniloc and Snap Inc. have agreed to (1) extend Uniloc's deadline to respond to Snap Inc.'s pending motions (Dkt. Nos. 35 and 150) by two weeks; and (2) withdrawing Uniloc's notices of depositions without re-noticing them for at least two weeks.

6. The parties have agreed to seek this extension not for delay but so that justice can be served.

Therefore, the parties respectfully request that this Court extend Uniloc's deadline to respond to Snap Inc.'s motion to dismiss or transfer venue (Dkt. 35, Member Case) and motion to stay (Dkt. 150, Lead Case) to June 30, 2017.

Dated: June 15, 2017

Respectfully submitted,

/s/ Travis Richins

James L. Etheridge
Texas State Bar No. 24059147
Ryan S. Loveless
Texas State Bar No. 24036997
Brett A. Mangrum
Texas State Bar No. 24065671
Travis Lee Richins
Texas State Bar No. 24061296
ETHERIDGE LAW GROUP, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, Texas 76092
Telephone: (817) 470-7249
Facsimile: (817) 887-5950
Jim@EtheridgeLaw.com
Ryan@EtheridgeLaw.com
Brett@EtheridgeLaw.com
Travis@EtheridgeLaw.com
ATTORNEYS FOR UNILOC

By: /s/ Reuben Chen _____
Reuben H. Chen
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Tel: (650) 843-5000
Fax: (650) 843-7400
rchen@cooley.com
Deron R. Dacus
Texas Bar No. 00790553
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Tel: (903) 705-1117
Fax: (903) 705-1117
ddacus@dacusfirm.com
*Attorneys for Defendant
Snap Inc.*

CERTIFICATE OF SERVICE

I certify that on June 15, 2017 the foregoing document was served upon all counsel of record via the court's electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/ Travis Richins
Travis Richins

CERTIFICATE OF CONFERENCE

Counsel for Snap Inc. has indicated that Snap Inc. is unopposed to this motion.

/s/ Travis Richins
Travis Richins