

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

NEXTGEN INNOVATIONS, LLC,

Plaintiff,

v.

FUJITSU NETWORK COMMUNICATIONS,
INC., ET AL.,

Defendants.

Case No. 2:22-cv-00307-JRG-RSP

LEAD CASE

NEXTGEN INNOVATIONS, LLC,

Plaintiff,

v.

AT&T SERVICES, INC. AND AT&T CORP.,
ET AL.,

Defendants.

Case No. 2:22-cv-00308-JRG-RSP

MEMBER CASE

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF RESOLUTION

Plaintiff NextGen Innovations, LLC (“NextGen”) and Defendants AT&T Services, Inc. and AT&T Corp. (collectively, “AT&T”) hereby file this Joint Motion to Stay All Deadlines. The parties have reached an agreement in principle on all matters in controversy and request that the Court stay the remaining case deadlines for 30 days, so that the parties may finalize the resolution agreement and prepare the appropriate dismissal papers for the Court. In light of the resolution and requested stay, the parties also ask that the Court vacate the Pretrial Conference currently scheduled for April 2, 2024 before Judge Payne.

DATED: March 29, 2024

Respectfully submitted,

/s/ Benjamin T. Wang

Benjamin T. Wang

CA State Bar No. 228712

Email: bwang@raklaw.com

Irene Y. Lee

CA State Bar No. 213625

Email: ilee@raklaw.com

Andrew D. Weiss

CA State Bar No. 232974

Email: aweiss@raklaw.com

Paul A. Kroeger

CA State Bar No. 229074

Email: pkroeger@raklaw.com

Peter Tong

TX State Bar No. 24119042

Email: ptong@raklaw.com

RUSS AUGUST & KABAT

12424 Wilshire Blvd., 12th Floor

Los Angeles, California 90025

Telephone: (310) 826-7474

Facsimile: (310) 826-6991

Claire Abernathy Henry

Texas State Bar No. 24053063

Email: claire@wsfirm.com

Andrea L. Fair

Texas State Bar No. 24078488

Email: andrea@wsfirm.com

Chad Everingham

Texas State Bar No. 00787447

Email: ce@wsfirm.com

WARD, SMITH & HILL, PLLC

PO Box 1231

Longview, Texas 75606-1231

(903) 757-6400 (telephone)

(903) 757-2323 (facsimile)

Attorneys for Plaintiff

NextGen Innovations, LLC

/s/ Brett C. Govett

Deron R. Dacus

Texas Bar No. 00790553

ddacus@dacusfirm.com

THE DACUS FIRM, PC

821 ESE Loop 323, Suite 430

Tyler, TX 75701

Tel: (903) 705-1117

Fax: (903) 581-2543

Brett C. Govett (LEAD ATTORNEY)

Texas Bar No. 08235900

Brett.govett@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP

2200 Ross Avenue, Suite 3600

Dallas, TX 75201

Tel: (214) 855-8000

Daniel Leventhal

Texas Bar No. 24050923

Daniel.leventhal@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP

1301 McKinney, Suite 5100

Houston, TX 77010

Tel: (713) 651-5151

Talbot Hansum

State Bar No. 24084586

Daniel S. Shuminer

State Bar No. 24124688

David Dyer

State Bar No. 24089580

Catherine Jean Garza

State Bar No. 24073318

NORTON ROSE FULBRIGHT US LLP

98 San Jacinto Boulevard, Suite 1100

Austin, TX 78701-4255

Telephone: (512) 474-5201

Facsimile: (512) 536-4598

talbot.hansum@nortonrosefulbright.com

daniel.shuminer@nortonrosefulbright.com

david.dyer@nortonrosefulbright.com

cat.garza@nortonrosefulbright.com

Matthew Gaudet

MCGaudet@duanemorris.com

John R. Gibson
JRGibson@duanemorris.com
Daniel Mitchell
DMitchell@duanemorris.com
Sajid Saleem
Ssaleem@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree Street, Suite 1700
Atlanta, Georgia 30309
Tel: (404) 253.6900

John M. Baird
jmbaird@duanemorris.com
DUANE MORRIS LLP
505 9th Street, NW, Suite 1000
Washington, DC 20004
Tel: (202) 776-7819

Brianna M. Vinci
Bvinci@duanemorris.com
DUANE MORRIS LLP
30 S 17th Street
Philadelphia, PA 19103
Tel: (215) 979-1198

Holly Elin Engelmann
HEngelmann@duanemorris.com
DUANE MORRIS LLP
Terrace 7 2801 Fortuna Suite 200
Austin, TX 78746
Tel: (214) 257-7226

Monte T. Squire
Mtsquire@duanemorris.com
DUANE MORRIS LLP
1201 N Market St Suite 501
Wilmington, DE 19801
Tel: (302) 657-4918

*Attorneys for Defendants
AT&T Services, Inc. and AT&T Corp.*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by electronic mail on this 29th day of March, 2024.

/s/ Benjamin T. Wang
Benjamin T. Wang

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), the undersigned certifies that counsel for Plaintiff met and conferred with counsel for Defendants on this 29th day of March, 2024. AT&T joins in the requested relief.

/s/ Benjamin T. Wang
Benjamin T. Wang