

**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,

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**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 29<sup>th</sup> day of March, 2024. AT&T joins in the requested relief.

/s/ Benjamin T. Wang  
Benjamin T. Wang