

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NOBLE INNOVATIONS NC L.L.C.,

Plaintiff,

v.

COLGATE-PALMOLIVE COMPANY,
WALMART, INC., and
TARGET CORPORATION,

Defendants.

Civil Action No. 8:22-cv-03373-PX

JOINT STIPULATION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND

Plaintiff Noble Innovations NC L.L.C. (“Noble” or “Plaintiff”) and Defendants Colgate-Palmolive Company (“Colgate”), Walmart, Inc. (“Walmart”), and Target Corporation (“Target”) (collectively, “Defendants”) jointly come before the Court and stipulate that:

- On January 11, 2023, Walmart agreed to waive formal service of process, and, in accordance with Federal Rule of Civil Procedure 12(a)(1)(A)(ii), Walmart’s deadline to answer or otherwise respond to Noble’s Complaint is March 13, 2023;
- Colgate was served with a summons and the Complaint in this action on February 22, 2023, and its deadline to answer or otherwise respond to Noble’s Complaint is March 15, 2023 pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i); and
- Target was served with a summons and the Complaint in this action on February 22, 2023, and its deadline to answer or otherwise respond to Noble’s Complaint is March 15, 2023 pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i).

To allow all Defendants to respond to the Complaint on the same day, the Parties agree to: (i) extend the time for Colgate and Target to file answers or otherwise respond to the

Complaint by 30 days; and (ii) extend the time for Walmart to file its answer or otherwise respond to the Complaint by 32 days, such that the new answer deadline for all Defendants is April 14, 2023.

The Parties have met and conferred and consent to this Stipulation for additional time.

Dated: March 10, 2023

Respectfully submitted,

/s/ Joseph J Zito

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Attorneys for Defendants
Colgate-Palmolive Company,
Walmart, Inc., and
Target Corporation

SO ORDERED:

Honorable Paula Xinis
United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document, JOINT STIPULATION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND, via the Court's CM/ECF system and that the following attorneys for Defendants are being served via email:

Michael C. Wilson, mwilson@munckwilson.com
Amy E. LaValle, alavalle@munckwilson.com

Dated: March 10, 2023

/s/ Joseph J Zito

Joseph J. Zito

Attorney for Plaintiff

Noble Innovations NC L.L.C.