

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

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD;
SAMSUNG ELECTRONICS AMERICA,
INC.; and SAMSUNG DISPLAY CO. LTD.,

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT
AND WAIVER OF FOREIGN SERVICE REQUIREMENT**

Samsung Electronics America, Inc., Samsung Electronics Company, Ltd., and Samsung Display Co. Ltd. (collectively “Defendants”), without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer, or otherwise respond to Plaintiff’s Complaint. In support of their Motion, Defendants state as follows:

1. On March 10, 2023, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics, Inc., Samsung Electronics Company, Ltd., and Samsung Display Co., Ltd.

2. On March 14, 2023, Defendant Samsung Electronics America, Inc. was served with Plaintiff’s Complaint. Samsung Electronics Company, Ltd. and Samsung Display Co., Ltd. have not yet been served.

3. Counsel for Defendants have agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd. and Samsung Display Co., Ltd., foreign entities, in exchange for a 90-day extension of time to answer or otherwise plead by July 3, 2023.

4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendants Samsung Electronics America, Inc., Samsung Electronics Company, Ltd., and Samsung Display Co., Ltd. request that the time in which they are required to move, answer or otherwise respond to Plaintiff's Complaint be extended up to and including July 3, 2023.

Dated: March 31, 2023

Respectfully submitted,

By: /s/ Melissa R. Smith
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Samsung Display Co., Ltd.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 31, 2023.

/s/ Melissa R. Smith

Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Melissa R. Smith

Melissa R. Smith