

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

CROGA INNOVATIONS LTD.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:24-cv-00065-JRG
	§	(Lead Case)
	§	
CISCO SYSTEMS, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	
CROGA INNOVATIONS LTD.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:24-cv-00206-JRG
	§	(Member Case)
	§	
FORTINET, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	
CROGA INNOVATIONS LTD.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:24-cv-00208-JRG
	§	(Member Case)
	§	
PALO ALTO NETWORKS, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	

**PLAINTIFF CROGA INNOVATIONS LTD.'S UNOPPOSED
MOTION FOR LEAVE TO AMEND INFRINGEMENT
CONTENTIONS FOR DEFENDANT CISCO SYSTEMS, INC.
AND TO AMEND THE DOCKET CONTROL ORDER**

Plaintiff Croga Innovations Ltd. (“Croga”) respectfully moves the Court for leave to serve its amended infringement contentions (“ICs”) for Defendant Cisco Systems, Inc. (“Cisco”) and to amend the Docket Control Order to allow Cisco, Fortinet, Inc. (“Fortinet”), and Palo Alto Networks, Inc. (“PAN”) (collectively “Defendants”) additional time to comply with P.R. 3-3, P.R. 3-4, and this Court’s standing Order Regarding Subject-Matter Eligibility Contentions (“Invalidity Contentions”) on August 5, 2024. Additionally, attached the First Amended Docket Control Order corrects a typographical error updating the date to Comply with P.R. 4-1 (Exchange Proposed Search Terms) from January 2, 2024 to January 2, 2025. Croga and Defendants have conferred and Defendants do not oppose this motion.

On May 15, 2024, Croga served its original infringement contentions. Thereafter, Cisco raised certain issues with Croga’s infringement contentions and requested more detail for some of Croga’s contentions and that Croga supplement its contentions. Croga served its amended infringement contentions on July 16, 2024, and Cisco does not oppose this motion for leave for Croga to serve the amended infringement contentions provided that, consistent with P.R. 3-6, Defendants are allowed 20 days after the date of service to serve their Invalidity Contentions.¹ Accordingly, good cause exists for the Court to grant Croga leave to serve the amended infringement contentions and enter the First Amended Docket Control Order.

Dated: July 16, 2024

Respectfully submitted,

By: /s/ Brett Cooper
Brett E. Cooper (NY SBN 4011011)

¹ Cisco maintains that Croga’s infringement contentions remain deficient and reserves all rights regarding any other objections it may have to Croga’s July 16 amended infringement contentions.

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*Attorneys for Plaintiff Croga Innovations
Limited*

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is an unopposed motion.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record on July 16, 2024.

/s/ Brett Cooper
Brett Cooper