IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

OPTIMUM IMAGING TECHNOLOGIES LLC,	§	
Plaintiff,	§	**C.A. No. 4:23-cv-00923-ALM**
v.	§	**JURY TRIAL DEMANDED**
NIKON CORPORATION,	§	
Defendant.	§	
OPTIMUM IMAGING TECHNOLOGIES LLC,	§	
Plaintiff,	§	**C.A. No. 4:23-cv-00927-ALM**
v.	§	**JURY TRIAL DEMANDED**
SAMSUNG ELECTRONICS CO., LTD., et al.,	§	
Defendants.	§	
OPTIMUM IMAGING TECHNOLOGIES LLC,	§	
Plaintiff,	§	**C.A. No. 4:23-cv-00928-ALM**
v.	§	**JURY TRIAL DEMANDED**
SONY CORPORATION,	§	
Defendant.	§	

<u>JOINT / UNOPPOSED MOTION TO STAY ALL DEADLINES FOR TWO WEEKS</u>

At the hearing on March 27, 2025, Plaintiff Optimum Imaging Technologies LLC ("OIT") informed the Court that it anticipated reaching settlements-in-principle with Defendants in all the above-captioned matters within the next few weeks. That is still the case; the parties are diligently communicating with individuals located in different time zones and anticipate filing Notices of Settlement in the above-captioned matters in the next couple of weeks.

Under Local Rules CV-5(a)(3)(C) and CV-7(e)–(f), briefs for several motions in the above-captioned matters would be due this week, including: Nikon's reply in further support of its motion for leave to amend its invalidity contentions would be due on April 1, 2024, *see Nikon*, Dkt. 70 (filed after 5pm CDT); Sony's reply in further support of its motion for leave to amend its invalidity contentions would be due on April 1, 2025, *see Sony*, Dkt. 86 (filed after 5pm CDT); OIT's response to Defendants' joint motion to compel production of financial documents would be due on April 1, 2025, *see*, *e.g.*, *Nikon*, Dkt. 67 (filed after 5pm CDT); *Samsung*, Dkt. 96 (filed after 5pm CDT); *Sony*, Dkt. 79 (filed after 5pm CDT); and OIT's sur-reply in further support of its motion for leave to amend its infringement contentions against the Samsung Defendants would be due on April 2, 2025, *see Samsung*, Dkt. 104 (filed after 5pm CDT).

In view of the above, OIT and Defendant Nikon Corporation respectfully request that this Court stay all deadlines for a period of two weeks in their litigation (4:23-cv-923), and OIT and Defendant Sony Corporation respectfully request that this Court stay all deadlines for a period of two weeks in their litigation (-928). OIT further respectfully requests that this Court stay all deadlines for a period of two weeks in its litigation against the Samsung Defendants (-927). As set forth in the certificate of conference below, OIT conferred with counsel for the Samsung Defendants, and the Samsung Defendants do not oppose this requested relief.

April 1, 2025

/s/ Ronald Wielkopolski

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ATTORNEYS FOR DEFENDANT SONY CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2025, I caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users and counsel of record.

/s/ Ronald Wielkopolski
Ronald Wielkopolski

CERTIFICATE OF CONFERENCE

I hereby certify that: on March 30, 2025 and March 31, 2025, OIT counsel conferred with Sony counsel and Sony joins this motion; on March 31, 2025, OIT counsel conferred with Nikon counsel and Nikon joins this motion; and that on March 31, 2025, OIT counsel conferred with counsel for the Samsung Defendants and the Samsung Defendants do not oppose this request for relief.

/s/ Ronald Wielkopolski
Ronald Wielkopolski