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

HEADWATER RESEARCH LLC Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:23-cv-00641

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. and Samsung Electronics Company, Ltd., Defendants herein, 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 December 29, 2023, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics America, Inc. and Samsung Electronics Company, Ltd.

2. On January 2, 2024, Defendant Samsung Electronics America, Inc. was served with Plaintiff's Complaint. Samsung Electronics Company, Ltd. has not yet been served.

3. Counsel for Defendants have agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd., a foreign entity, in exchange for a 90-day extension of time for all defendants to answer or otherwise plead by April 22, 2024.

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. and Samsung Electronics Company, Ltd. respectfully 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 April 22, 2024.

Dated: January 8, 2024

Respectfully submitted,

/s/ Melissa R. Smith

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Samsung Electronics America, Inc. and
Samsung Electronics Company, 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 January 8, 2024.

/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