

From: [Lao, Jason](#)
To: [David Moreland](#)
Cc: [Warren Thomas](#); [Gregory Carlin](#); [John Harbin](#)
Subject: RE: GTRC v. Murata - Confirmation of EOT and Waiver of Service
Date: Thursday, December 12, 2024 2:41:58 PM
Attachments: [image004.png](#)

Caution: This email originated from outside your organization.

David,

Thanks for the discussion and email. I appreciate you all agreeing to file the 30-day extension, and I write to clarify a few things below. As you correctly noted, I do not yet represent MMC in connection with this litigation, and while I anticipate the parties will be able to negotiate a waiver of service for MMC, and to put the case on the same time track, I do not yet speak on behalf of MMC.

Relatedly, we did not discuss on our call what the new schedule would be, only that it would be to the benefit of the parties (and the Court) should the schedules between MMC and MENA be aligned. But regarding your note below, I am not able to accept service of the waiver for MMC below at this point, much less agree to pre-dating it to an earlier time.

Best,
Jason

HAYNES BOONE

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From: David Moreland <DMoreland@mcciplaw.com>
Sent: Thursday, December 12, 2024 7:22 AM
To: Lao, Jason <Jason.Lao@haynesboone.com>
Cc: Warren Thomas <wthomas@mcciplaw.com>; Gregory Carlin <GCarlin@mcciplaw.com>; John Harbin <jharbin@mcciplaw.com>
Subject: GTRC v. Murata - Confirmation of EOT and Waiver of Service

EXTERNAL: Sent from outside Haynes and Boone, LLP

Jason –

Thanks for the discussion yesterday. GTRC is willing to provide Murata Electronics North America (MENA) a 30-day extension of time to respond to the complaint, moving MENA's answer date to **January 15, 2025**. We understand that—while you currently do not represent Murata Manufacturing Co. (MMC)—that if/when MMC retains you, MMC should be amenable to waiving formal service in exchange for an agreement to synch the case schedules for both

MMC and MENA. As part of this 30-day extension, GTRC expects that the parties will have notified the Court of the joint answer/response date well in advance of January 15, 2025. However, in the absence of an agreement by MMC as to waiver of service, GTRC will not be able to agree to additional extensions for MENA beyond January 15, 2025.

In view of the above, please find attached a waiver of service for execution on behalf of MMC. The timing is based on our initial request sent to Joe Keating (MMC's Virginia-based counsel) on November 19, 2024. Further, we understand that you (or someone else within your firm already retained by MMC) will likewise provide a copy of this waiver request to MMC today. Please let us know if that is not the case.

As soon as you have authorization from MMC, please execute the waiver and send it back to us. We will then prepare a joint motion to set MMC's and MENA's answer/response date as **February 17, 2025**. In the meantime, we will prepare and file the 30-day extension request for MENA as noted above. We will also connect again by the end next week to check on your status regarding the waiver for MMC.

Regards,

David

David Moreland

Principal

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