IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

AUDIO POD IP, LLC, Plaintiff, v. AMAZON.COM, INC., AMAZON.COM LLC, AMAZON WEB SERVICES, INC., and AUDIBLE, INC., Defendants.	Case No. 2:24-cv-00185-AWA-LRL Jury Trial Demanded

UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT

Plaintiff Audio Pod IP, LLC ("Plaintiff"), by its counsel, pursuant to Local Rule 7, hereby moves the Court for a forty-five (45) day extension of time for Defendants Amazon.com, Inc., Amazon.com LLC, Amazon Web Services, Inc., and Audible, Inc. (collectively "Defendants") to respond to the Amended Complaint filed by Plaintiff in this lawsuit. Plaintiff waives a hearing concerning this Motion. In support of this Motion, Plaintiff states as follows:

1. Plaintiff filed its original complaint on March 20, 2024.

2. Plaintiff filed its Amended Complaint on March 28, 2024.

3. Plaintiff served the Amended Complaint on Defendants on April 2, 2024.

4. Defendants' response to the Amended Complaint is currently due on April 16, 2024. Thus, the time for responding to the Amended Complaint has not yet passed.

5. This is a complex lawsuit for patent infringement involving five patents relating to systems and methods for streaming media content, and synchronization of media content across devices.

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6. Defendants asked Plaintiff to seek the extension proposed in this motion. No party opposes the extension. Defendants have represented that they are in the process of obtaining outside counsel in this lawsuit. Good cause supports this extension to allow Defendants to retain counsel, evaluate the five asserted patents, investigate the allegations of infringement made in the Amended Complaint and to prepare a meaningful response to the Amended Complaint.

7. A forty-five (45) day extension of Defendants' time in which to respond to the Amended Complaint would make Defendants' response due on May 31, 2024.

8. No extension of time has previously been sought in this case. This request for an extension of time is not made for the purpose of delay. A forty-five (45) day extension will not materially change any other pretrial deadline and will not affect the Court's administration of this matter.

Accordingly, Plaintiff respectfully requests that the Court grant this Motion and enter the proposed Order filed herewith extending the time in which Defendants shall respond to the Amended Complaint to and through May 31, 2024.

Respectfully submitted,

Dated: April 16, 2024

By: */s/ Chandran B. Iyer*

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**Not admitted to practice in Virginia*

Certificate of Service

I certify that on April 16, 2024, I electronically filed the foregoing Unopposed Motion to Extend Time to Respond to Complaint with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: */s/ Chandran B. Iyer*

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