

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

USTA TECHNOLOGY, LLC,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 4:24-cv-00515-SDJ

JURY TRIAL DEMANDED

**USTA TECHNOLOGY, LLC’S UNOPPOSED MOTION FOR JURISDICTIONAL
DISCOVERY AND TO EXTEND THE TIME TO RESPONSE TO LENOVO GROUP
LIMITED’S MOTION TO DISMISS AND STRIKE THE SECOND AMENDED
COMPLAINT**

Plaintiff USTA Technology, LLC (“USTA”) hereby moves the Court for an order approving the jurisdictional discovery agreed to by the parties and extending briefing deadlines, and shows the Court as follows:

On March 18, 2025, Defendant Lenovo Group Limited (“LGL”) filed its Motion to Dismiss and Strike Plaintiff USTA Technology, LLC’s Second Amendment Complaint (“LGL’s Motion”). Dkt. No. 43. The parties have agreed to suspend the briefing schedule on the motion while they engage in jurisdictional discovery.

The parties have agreed to a phased approach to jurisdictional discovery, as set forth in the attached proposed order, and respectfully request that the Court approve the jurisdictional discovery agreed to by the parties. The parties agree that jurisdictional discovery will be deemed complete for purposes of these deadlines upon receipt by the parties of the final transcript of the final deposition taken for purposes of jurisdictional discovery. The parties further agree that the jurisdictional discovery taken pursuant to the present motion will not count against the limits set out in the Court’s Discovery Order governing this case.

The parties also agree to set the following briefing schedule on Lenovo's Motion:

USTA shall file its response to LGL's Motion up to and including fourteen (14) days after the completion of jurisdictional discovery.

LGL shall file its reply up to and including fourteen (14) days after USTA's response.

Counsel for USTA met and conferred with counsel for LGL, and the relief requested herein is unopposed.

Dated: April 15, 2025

Respectfully submitted,

DEVLIN LAW FIRM LLC

/s/Derek Dahlgren

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Attorneys for Plaintiff

USTA Technology, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 15, 2025.

/s/ Derek Dahlgren

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff and counsel for Defendant have complied with the meet and confer requirement in Local Rule CV-7(h) and that the relief requested herein is unopposed.

/s/ Derek Dahlgren