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

USTA TECHNOLOGY, LLC, *Plaintiff*, v. LENOVO (UNITED STATES), INC., and LENOVO GLOBAL TECHNOLOGY (UNITED STATES) INC., *Defendants*.	Civil Action No. 4:24-cv-515-SDJ JURY TRIAL DEMANDED

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF RULE 26(f) CONFERENCE AND RELATED DEADLINES

Defendants Lenovo (United States), Inc. and Lenovo Global Technology (United States) Inc. respectfully request that the Court grant an extension of the parties' deadline to conduct a Rule 26(f) and deadlines related thereto. The Court previously set deadlines for this case's Rule 26(f) Conference, Joint Rule 26(f) Report, and Rule 16 Case Management Conference. Dkt. No. 24 at 1. In light of the circumstances of this case, Defendants respectfully request that the Court grant the following extensions:

Event	**Previous Deadline**	**Extended Deadline**
Rule 26(f) Conference	December 12, 2024	January 20, 2025
Joint Rule 26(f) Report	December 30, 2024	February 7, 2025
Rule 16 Case Management Conference	January 15, 2025	[*Date to be determined by the Court*]

Good cause exists to grant the above extensions. These extensions are not sought for the purposes of delay. Plaintiff has filed multiple related suits against other defendants:

- *USTA Tech., LLC v. Samsung Elecs. Co., Ltd. et al.*, No. 4:24-cv-00517-SDJ (E.D. Tex. June 7, 2024):
- *USTA Tech., LLC v. LG Elecs. Inc., Ltd. et al.*, No. 4:24-cv-00516-SDJ (E.D. Tex. June 7, 2024);
- *USTA Tech., LLC v. AT&T Mobility LLC et al.*, No. 4:24-cv-00513-SDJ (E.D. Tex. June 7, 2024); and
- *USTA Tech., LLC v. AsusTek Comp. Inc. et al.*, No. 4:24-cv-00512-SDJ (E.D. Tex. June 7, 2024).

Several of these defendants have not yet answered, and the Court recently granted a 4-month extension of the deadlines in USTA's case against AT&T Mobility LLC. *See* No. 4:24-cv-00513-SDJ, Dkt. 36 (November 26, 2024). The extension would help align the schedule of the above-captioned case with these related cases.

Further, briefing on Defendants' Motion to Dismiss for lack of venue (Dkt. 21) is still ongoing. The extension is necessary to allow additional time for the briefing and resolution of that motion prior to requiring Defendants' appearance at the Rule 16 Management Conference. Finally, the motion is unopposed, and thus, Plaintiff will not be prejudiced by the extensions.

For these reasons, Defendants request that the deadline for the Rule 26(f) conference and deadlines related thereto be extended according to the table above.

Dated: December 10, 2024

/s/ Caroline W. Fox

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CERTIFICATE OF CONFERENCE

I have complied with the meet and confer requirements in Local Rule CV-7(h) and conferred with counsel for Plaintiff on December 10, 2024, and Plaintiff has indicated that it is unopposed to the relief requested herein.

/s/ *Caroline W. Fox*
Caroline W. Fox

CERTIFICATE OF SERVICE

The undersigned certifies that, on December 10, 2024, the foregoing document was filed electronically with the Clerk of the Court through the CM/ECF system, which will send a notice of electronic filing to all counsel of record who are deemed to have consented to electronic service.

/s/ *Caroline W. Fox*
Caroline W. Fox