

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

SHOPSEE, INC.,

Plaintiff,

vs.

TIKTOK INC.,

Defendant.

Civil Action No. 7:24-cv-00333-DC-DTG

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND THE DEADLINE FOR TIKTOK’S RESPONSE TO
SHOPSEE’S OBJECTIONS AND EXTEND THE STAY OF TRANSFER**

Plaintiff ShopSee, Inc. (“ShopSee”) and Defendant TikTok Inc. (“TikTok”) (collectively, the “Parties”) respectfully jointly move the Court to (1) extend TikTok’s deadline for responding to ShopSee’s pending appeal/objections (Dkt. 93-2) regarding the Court’s Transfer Order (Dkt. 88) and (2) extend the stay of this case to allow time for briefing and this Court’s consideration and ruling on ShopSee’s pending appeal/objections.

On August 26, 2025, the Court entered its Transfer Order transferring the case to NDCA, but stayed the transfer “until September 24, 2025, to allow Plaintiff time to appeal this decision if it chooses.” Dkt. 88 at 7. On September 8, 2025, ShopSee filed its appeal from and objections to the Transfer Order. Dkt. 93-2. ShopSee’s appeal/objections are currently pending.

Pursuant to agreement by the Parties and pending this Court’s approval, the Parties jointly respectfully request that the Court order the following:

- TikTok’s response shall be due no later than September 29, 2025.
- The stay of this case and of transfer shall be extended until the District Court rules on ShopSee’s appeal/objections. The stay continues to encompass all unreach deadlines, except deadlines related to managing the stay and any filings related to

ShopSee's appeal/objections (Dkt. 93-2).

AGREED:

By: /s/ Paige Arnette Amstutz

By: /s/ Ognjen Zivojnovic

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Counsel for Defendant TikTok Inc.

Counsel for Plaintiff ShopSee, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on September 22, 2025, 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.

/s/ Joseph Previti
Joseph Previti

CERTIFICATE OF CONFERENCE

The Parties have complied with the meet and confer requirement and the motion is submitted as agreed.

/s/ Joseph Previti
Joseph Previti