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

MASSIVELY BROADBAND LLC Plaintiff, v. SAMSUNG ELECTRONICS CO. LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:25-cv-00608-JRG

UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND WAIVER OF FOREIGN SERVICE REQUIREMENT

Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc., Defendants herein, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer or otherwise respond to Plaintiff's Complaint. In support of their Motion, Defendants state as follows:

1. On June 6, 2025, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics Company, Ltd., and Samsung Electronics America, Inc.

2. On June 9, 2025, Defendant Samsung Electronics America, Inc. was served with Plaintiff's Complaint. Samsung Electronics Company, Ltd. has not yet been served.

3. Counsel for Defendants has agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd., a foreign entity, in exchange for a 91-day extension of time for all defendants to answer or otherwise plead by September 29, 2025.

4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc. respectfully request that the time in which they are required to move, answer or otherwise respond to Plaintiff's Complaint be extended up to and including September 29, 2025.

Dated: June 25, 2025

Respectfully submitted,

/s/ Melissa R. Smith

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Samsung Electronics Company, Ltd. and
Samsung Electronics America, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 25th day of June 2025.

/s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Melissa R. Smith
Melissa R. Smith

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ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND WAIVER OF FOREIGN SERVICE REQUIREMENT

Before the Court is Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc.'s Unopposed Motion for Extension of Time to Move, Answer, or Otherwise Respond to Plaintiff's Complaint and Waiver of Foreign Service Requirement. After considering same, the Court is of the opinion that the Motion should be GRANTED.

IT IS ORDERED that the deadline for Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc., to answer or otherwise respond to Plaintiff's Complaint is hereby extended up to and including September 29, 2025.

IT IS FURTHER ORDERED that service of process for Samsung Electronics Co. Ltd. has been waived.