

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

PICTIVA DISPLAYS INTERNATIONAL	)	
LTD.,	)	
KEY PATENT INNOVATIONS LIMITED	)	
	)	
Plaintiffs,	)	Civil Action No. 2:23-CV-00495-JRG
	)	
vs.	)	JURY TRIAL DEMANDED
	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	

**NOTICE OF WITHDRAWAL OF PLAINTIFFS' MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT (DKT. 111 & 112)**

In an effort to ensure consolidation of the instant action with Case No. 2:24-cv-00532-JRG, Plaintiffs Pictiva Displays International Ltd. and Key Patent Innovations Limited (collectively, “Pictiva”) hereby withdraw its Motion for Leave to File Second Amended Complaint (Dkt. 111) bringing a claim of infringement of U.S. Patent No. 12,158,250, published as US2024/0110678A1. A revised Second Amended Complaint with KPI added as a co-plaintiff as authorized by Dkt. 118 is filed immediately subsequent to this Notice.

Dated: December 17, 2024

Respectfully submitted,

/s/ Jason Sheasby

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.

104 East Houston Street Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Jason G. Sheasby (*pro hac vice*)
jsheasby@irell.com
H. Annita Zhong, PhD (*pro hac vice*)
hzhong@irell.com
Rebecca Carson (*pro hac vice*)
rcarson@irell.com
Jie Gao (*pro hac vice*)
jgao@irell.com
Jeffrey Linxwiler (*pro hac vice*)
jlinxwiler@irell.com

IRELL & MANELLA LLP

1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel. (310) 277-1010
Fax (310) 203-7199

***Attorneys for Plaintiff Pictiva Displays
International Ltd. and Key Patent Innovations
Limited***

CERTIFICATE OF SERVICE

I hereby certify that, on December 17, 2024, a copy of the foregoing was served to all counsel of record via the Court's ECF system.

/s/ Jeffrey Linxwiler
Jeffrey Linxwiler