

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

TVnGO Ltd.,	§	
	§	
Plaintiff,	§	Case No. 7:25-cv-00549-DC-DTG
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD. and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION TO EXTEND TIME TO MOVE, ANSWER, OR
OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., Defendants herein, without waiving any defenses, 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 November 26, 2025, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
2. On February 10, 2026, Defendant Samsung Electronics America, Inc. was served with Plaintiff’s Complaint. Samsung Electronics Co., Ltd. has not yet been served.
3. Counsel for Defendants has agreed to waive service under the Hague Convention for Samsung Electronics Co., Ltd., a foreign entity, in exchange for 90 days for all Defendants to answer or otherwise plead by June 1, 2026.
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 Co., Ltd. and Samsung Electronics America, Inc., respectfully request that the time in which it is required to move, answer, or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended up to and including June 1, 2026. This extension will not change the date for any hearing, any final submission to the Court related to a hearing, or the trial.

Dated: February 26, 2026

Respectfully submitted,

/s/ John M. Guaragna

John M. Guaragna

Texas Bar No 24043308

DLA PIPER LLP (US)

303 Colorado, Suite 3000

Austin, TX 78701

Tel: 512.457.7125

Fax: 512.457.7001

john.guaragna@us.dlapiper.com

**ATTORNEY FOR DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 26, 2026, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by facsimile and/or first-class mail.

/s/ John M. Guaragna

John M. Guaragna