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

VERTICAL COMPUTER SYSTEMS,	§	
INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 2:10-CV-490
	§	
INTERWOVEN, INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC., LG ELECTRONICS INC.,	§	
SAMSUNG ELECTRONICS CO., LTD.,	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	

SAMSUNG DEFENDANTS' AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendant Samsung Electronics America, Inc. ("SEA") moves to extend the time for SEA to answer, object to, move, or otherwise respond to Plaintiff's Complaint from December 17, 2010 to February 22, 2011. SEA and Vertical have agreed to the extension and have also agreed that Samsung Electronics Co., Ltd. ("SEC"), which is located outside of the United States, will waive service of process, so that both Samsung Defendants would have the same deadline for responding to the Complaint.

This motion is not made for delay, but only to allow for an orderly resolution of issues in the case and to dispense with the need for extraordinary procedures for service of process on SEC.

Therefore, SEA respectfully requests that the Court extend the time to respond to the Complaint until February 22, 2011.

DATED: December 16, 2010 Respectfully submitted,

/s/ Eric H. Findlay

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 16th day of December 2010, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ *Eric H. Findlay*Eric H. Findlay