

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

VERTICAL COMPUTER SYSTEMS, INC.,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 2:10-cv-490
v.	§	
	§	<b>JURY TRIAL DEMANDED</b>
INTERWOVEN, INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC., LG ELECTRONICS	§	
INC., SAMSUNG ELECTRONICS CO.,	§	
LTD., SAMSUNG ELECTRONICS	§	
AMERICA, INC.,	§	
	§	
Defendants.	§	

**PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO  
EXCEED PAGE LIMITATIONS IN THEIR OPPOSITION TO  
INTERWOVEN, INC.'S MOTION TO STAY, DISMISS OR TRANSFER**

Pursuant to L.R. CV-7(1), Plaintiff Vertical Computer Systems, Inc. ("Vertical") respectfully moves the Court for Leave to Exceed their Page Limitations in their Opposition to Interwoven, Inc's Motion to Stay, Dismiss or Transfer.

In light of the complex history between Vertical and Defendant Interwoven, Inc. ("Interwoven") and the co-pending declaratory judgment action Interwoven filed against Vertical in California, all of which are relevant to the instant dispute, Vertical believes that three and a half additional pages beyond the fifteen page limit are required to fully develop the facts and the law. Interwoven originally agreed but now opposes Vertical's request for additional pages because Interwoven believes that Vertical should dismiss this lawsuit in light of a Northern District of California Order denying Vertical's motion to dismiss or transfer Interwoven's declaratory judgment action against Vertical. Vertical disagrees that it should dismiss this lawsuit and that it must therefore file its response to Interwoven's Motion to Stay, Dismiss, or Transfer.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully request that the Court grant to exceed the page limitations in their Opposition to Interwoven, Inc.'s Motion to Stay, Dismiss or Transfer.

Dated: January 27, 2011

Respectfully Submitted,

**VERTICAL COMPUTER SYSTEMS, INC.**

By: /s/ William E. Davis, III  
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**ATTORNEYS FOR PLAINTIFF**  
**VERTICAL COMPUTER SYSTEMS, INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 27th day of January, 2011.

/s/ William E. Davis, III  
William E. Davis, III

**CERTIFICATE OF CONFERENCE**

The personal conference required by Local Rule CV-7(h) and (i) was conducted on January 27, 2011 via telephone between the undersigned and Robert Christopher Bunt. Mr. Bunt stated that his client would not agree to additional pages because his client believes that Vertical should dismiss this case. Vertical disagrees that this case should be dismissed. Discussions have conclusively ended in an impasse.

/s/ William E. Davis, III  
William E. Davis, III