

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

VERTICAL COMPUTER SYSTEMS, INC.

Plaintiff,

v.

INTERWOVEN, INC., LG ELECTRONICS
MOBILECOMM U.S.A., INC., LG
ELECTRONICS INC., SAMSUNG
ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.

CIVIL ACTION NO. 2:10-cv-490

(Eastern District of Texas)

**LG ELECTRONICS DEFENDANTS' SECOND AGREED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Defendants LG Electronics Mobilecomm U.S.A., Inc. and LG Electronics Inc. (“LG Defendants”), without waiving any defenses described or referred to in Federal Rule 12, move to extend the time to object to, respond to, move, or otherwise answer Vertical Computer Systems, Inc.’s (“Vertical”) complaint to and including April 12, 2011.

This motion is not made for delay, but only to permit orderly resolution of issues in the case.

Wherefore, the LG Defendants respectfully request that the Court extend the time to object to, respond to, move, or otherwise answer the complaint until April 12, 2011.

Dated: February 9, 2011

Respectfully submitted,

/s/ David J. Healey
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ELECTRONICS MOBILECOMM U.S.A., INC.
and LG ELECTRONICS INC.

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CERTIFICATE OF CONFERENCE

I certify that I conferred with opposing counsel on this motion and it is agreed to by both Plaintiff and the LG Defendants.

/s/ David J. Healey
David J. Healey

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2011, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service per Local Rule CV-5(a)(3).

/s/ Jason Bonilla
Jason Bonilla
