



III.

SEA and SEC seek this extension of time not for delay, but for good cause so that justice may be served.

IV.

WHEREFORE, SEA and SEC respectfully request that the Court extend the time to respond to the Complaint until May 27, 2011.

DATED: May 20, 2011

Respectfully submitted,

/s/ Eric H. Findlay

Eric H. Findlay

State Bar No. 00789886

efindlay@findlaycraft.com

**FINDLAY CRAFT LLP**

6760 Old Jacksonville Hwy Suite 101

Tyler, TX 75703

Telephone: 903-534-1100

Fax: 903-534-1137

OF COUNSEL:

Matthew D. Powers

matthew.powers@weil.com

Steven Cherensky

steven.cherensky@weil.com

**WEIL, GOTSHAL & MANGES LLP**

201 Redwood Shores Parkway

Redwood Shores, CA 94065

Telephone: 650-802-3000

Fax: 650-802-3100

Timothy DeMasi

tim.demasi@weil.com

Julian Moore

julian.moore@weil.com

**WEIL, GOTSHAL & MANGES LLP**

767 5th Avenue

New York, NY 10153

Telephone: 212-310-8000

Fax: 212-310-8007

**ATTORNEYS FOR DEFENDANTS  
SAMSUNG ELECTRONICS CO., LTD.  
SAMSUNG ELECTRONICS AMERICA, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 20th day of May, 2011, 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