

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.	§	JURY TRIAL DEMANDED
	§	
INTERWOVEN, INC.,	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC., LG ELECTRONICS	§	
INC., SAMSUNG ELECTRONICS CO.,	§	
LTD., SAMSUNG ELECTRONICS	§	
AMERICA, INC.,	§	
	§	
Defendants.	§	

**LG ELECTRONICS DEFENDANTS’ 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”), move to extend the time to object to, respond to, move, or otherwise answer Vertical Computer Systems, Inc.’s (“Vertical”) complaint for sixty days from December 13, 2010 to February 11, 2011, and have agreed with Vertical that in exchange for this extension, the LG Defendants that are located outside of the United States will waive any further need for service of process.

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

Wherefore, the LG Defendants respectfully request that the Court extend the time to object to, respond to, move, or otherwise answer the complaint until February 11, 2011.

Respectfully submitted,

/s/ David J. Healey

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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 December 13, 2010, 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/ Stacci H. Mahadeo
Stacci H. Mahadeo