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

VERTICAL COMPUTER SYSTEMS, INC.,	§	
DI 1 . 100	§	
Plaintiff,	§	
	§	Civil No. 2:10-CV-00490-JRG
V.	§	
	§	
LG ELECTRONICS MOBILECOMM	§	
U.S.A., INC., LG ELECTRONICS INC.,	§	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.,	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	

DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S RESPONSE TO LG ELECTRONICS MOBILECOMM U.S.A., INC. AND LG ELECTRONICS INC.'S MOTION TO SEVER AND TRANSFER CLAIMS TO THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY OR IN THE ALTERNATIVE TO THE NORTHERN DISTRICT OF CALIFORNIA

Defendants, Samsung Electronics Co., Ltd. ("SEC"), and Samsung Electronics America, Inc. ("SEA"), (collectively, "Samsung"), do not oppose LG Electronics Mobilecomm U.S.A., Inc. and LG Electronics Inc.'s motion to sever and transfer claims to the United States District Court for the District of New Jersey or in the alternative to the Northern District of California.

Dated: August 16, 2012	Respectfully submitted,
	By: /s/ Eric H. Findlay
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# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 16, 2012 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail.

/s/ Eric H. Findlay

Eric H. Findlay