

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

Eolas Technologies Incorporated,	§	
	§	
Plaintiff,	§	Civil Action No. 6:09-CV-00446-LED
	§	
vs.	§	
	§	
Adobe Systems Inc., Amazon.com, Inc.,	§	JURY TRIAL
Apple Inc., Argosy Publishing, Inc.,	§	
Blockbuster Inc., CDW Corp.,	§	
Citigroup Inc., eBay Inc., Frito-Lay, Inc.,	§	
The Go Daddy Group, Inc., Google Inc.,	§	
J.C. Penney Company, Inc., JPMorgan	§	
Chase & Co., New Frontier Media, Inc.,	§	
Office Depot, Inc., Perot Systems Corp.,	§	
Playboy Enterprises International, Inc.,	§	
Rent-A-Center, Inc., Staples, Inc., Sun	§	
Microsystems Inc., Texas Instruments Inc.,	§	
Yahoo! Inc., and YouTube, LLC	§	
	§	
Defendants.	§	

JOINT MOTION TO STAY

Plaintiff Eolas Technologies Incorporated and Defendant Texas Instruments Inc. hereby jointly and respectfully request that all activities (discovery, expert reports, etc.) as to Texas Instruments Inc. be stayed for two weeks. The parties have reached an oral agreement to settle this case subject to the drafting and execution of a written settlement and license agreement acceptable to both parties. The Parties respectfully request this stay and extension of all pre-trial deadlines so that the Parties may focus on the drafting and execution of a written settlement and license agreement. The Parties seek to execute a formal settlement agreement and stipulation of dismissal of all claims and counterclaims in this action within the next two weeks. The Parties agree that this Motion does not effect the date of trial, jury selection or the pretrial conference.

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**ATTORNEYS FOR DEFENDANT
TEXAS INSTRUMENTS INC.**

Respectfully submitted,

McKool Smith, P.C.

/s/ Mike McKool

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**ATTORNEYS FOR PLAINTIFF
EOLAS TECHNOLOGIES, 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 have consented to electronic service. Local Rule CV-5(a)(3)(A) on this June 3, 2011.

/s/ John B. Campbell
John B. Campbell

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Eolas Technologies Incorporated conferred with Carl Roth on behalf of Texas Instruments Inc. on June 3, 2011, regarding the foregoing motion, who represented that Texas Instruments Inc. joins in this motion.

Dated: June 3, 2011

/s/ John B. Campbell
John B. Campbell