### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

# UNILOC USA, INC., et al.

Plaintiffs,

Civ. Action No.: 6:10-cv-00472

JURY TRIAL DEMANDED

v.

NATIONAL INSTRUMENTS CORP., et al.

Defendants.

#### AGREED MOTION FOR STAY OF ALL DEADLINES FOR DEFENDANTS SAFENET, INC., ONYX GRAPHICS, INC., ALADDIN KNOWLEDGE SYSTEMS, INC., ALADDIN KNOWLEDGE SYSTEMS, LTD., PINNACLE SYSTEMS, INC., AND NATIONAL INSTRUMENTS CORPORATION

Plaintiffs Uniloc USA, Inc. and Uniloc Singapore Limited ("Uniloc") file this Agreed Motion for Stay of All Deadlines in said cause and respectfully requests a stay of all deadlines between Uniloc and Defendants SafeNet, Inc. ("SafeNet"), Onyx Graphics, Inc. ("Onyx"), Aladdin Knowledge Systems, Inc. and Aladdin Knowledge Systems, Ltd. ("Aladdin), Pinnacle Systems, Inc. ("Pinnacle"), and National Instruments Corporation ("National Instruments). The parties have reached a settlement and a motion to dismiss SafeNet, Onyx, Aladdin, Pinnacle, and National Instruments with prejudice shall be filed upon completion of certain settlement terms, which is expected to be within the next 35 days. SafeNet, Onyx, Aladdin, Pinnacle, and National Instruments agree to the relief sought by this motion.

WHEREFORE, PREMISES CONSIDERED, Uniloc prays that the Court enter the attached order and stay all pending deadlines between Uniloc and Defendants SafeNet, Onyx, Aladdin, Pinnacle and National Instruments through and including November 7, 2011.

Dated: October 3, 2011.

By:

/s/ Steven W. Hartsell Edward R. Nelson, III Texas State Bar No. 00797142 Barry J. Bumgardner Texas State Bar No. 24041918 Steven W. Hartsell Texas State Bar No. 24040199 S. Brannon Latimer Texas State Bar No. 24060137 Jaime K. Olin Texas State Bar No. 24070363 **NELSON BUMGARDNER CASTO, P.C.** 3131 West 7<sup>th</sup> Street, Suite 300 Fort Worth, Texas 76107 (817) 377-9111 (817) 377-3485 (fax) enelson@nbclaw.net barry@nbclaw.net shartsell@nbclaw.net blatimer@nbclaw.net jolin@nbclaw.net

T. John Ward, Jr. Texas State Bar No. 00794818 J. Wesley Hill Texas State Bar No. 24032294 **WARD & SMITH LAW FIRM** 111 West Tyler St. Longview, Texas 75601 Tel: (903) 757-6400 Fax: (903) 757-2323 jw@wsfirm.com wh@wsfirm.com

## ATTORNEYS FOR PLAINTIFFS UNILOC USA, INC. AND UNILOC SINGAPORE PRIVATE LIMITED

# **CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of October 2011, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/<u>s/ Steven W. Hartsell</u> Steven W. Hartsell