

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

PARKERVISION, INC.,

Plaintiff,

v.

QUALCOMM INCORPORATED,

Defendant.

)
)
)
)
)
)
)

Case No. 3:11-cv-719-RBD-JBT

**CONSENT MOTION TO EXTEND DEADLINE FOR PARKERVISION
TO RESPOND TO QUALCOMM'S DEFENSES AND COUNTERCLAIMS**

Plaintiff, ParkerVision, Inc., moves pursuant to Rule 6(b)(1)(A), Fed.R.Civ.P., to extend the deadline for responding to the affirmative defenses and counterclaims by defendant, Qualcomm Incorporated, until November 7, 2011, and in support says:

1. The current deadline for responding to Qualcomm's affirmative defenses and counterclaims (ECF 18) is October 24, 2011 (ECF 24). ParkerVision's initial deadline was October 7, 2011. This motion seeks an extension until November 7, 14 days beyond the current deadline and 30 days beyond the initial deadline.¹ November 7 is the deadline for Sterne Kessler, the other party to Qualcomm's counterclaim, to respond to the counterclaim.

¹ ParkerVision consented to Qualcomm's two requests for extensions to respond to ParkerVision's complaint. Those extensions totaled 36 days.

2. ParkerVision's attorneys have been diligently drafting a response to Qualcomm's counterclaim, but due to scheduling conflicts have not completed a response. Additionally, ParkerVision has not had the opportunity to review a draft.

3. ParkerVision's attorneys certify pursuant to Local Rule 3.01(g) that they have conferred in good faith with Qualcomm's attorneys, who consent to the relief requested in this motion.

SMITH HULSEY & BUSEY

By: /s/ James A. Bolling
Stephen D. Busey
James A. Bolling

Florida Bar Number 901253
225 Water Street, Ste. 1800
Jacksonville, FL 32202
(904) 359-7700
(904) 353-7708 (facsimile)
busey@smithhulsey.com
jbolling@smithhulsey.com

and

ALLEN, DYER, ET AL.,
Ava K. Doppelt, Esq.
FL Bar No. 393738
adoppelt@addmg.com
Brian R. Gilchrist, Esq.
FL Bar No. 774065
bgilchrist@addmg.com
255 South Orange Avenue, Suite 1401
Orlando, FL 32801
(407) 841-2330
(407) 841-2343 (facsimile)

Attorneys for ParkerVision, Inc.

Certificate of Service

I certify that on October 21, 2011, I electronically filed a copy of the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of the electronic filing to the following: John A. DeVault, III, Esq. and Courtney K. Grimm, Esq., Bedell, Dittmar, DeVault, Pillans & Coxe, The Bedell Building, 101 East Adams Street, Jacksonville, Florida 32202; Keith R. Hummel, Esq., David Greenwald, Esq., Peter A. Emmi, Esq. and Joseph E. Lasher, Esq., Cravath, Swaine & Moore, LLP, Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019; and Christopher A. Hughes, Esq., Cadwalader, Wickersham & Taft LLP, 1 World Financial Center, New York, New York 10281. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participant: Jorge A. Goldstein, Esq., Sterne Kessler Goldstein & Fox, 1100 New York Avenue, Suite 600, Washington, DC 20005.

/s/ James A. Bolling

Attorney

773815.1