



One Riverfront Plaza

1037 Raymond Blvd, Suite 600
Newark, NJ 07102

T: 973.757.1100

F: 973.757.1090

WALSH.LAW

Liza M. Walsh
Direct Dial: (973) 757-1101
lwalsh@walsh.law

March 1, 2018

VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
US District Court for the District of New Jersey
Martin Luther King, Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *ParkerVision, Inc. v. LG Electronics, Inc., et al.*
Civil Action No. 2:17-cv-05359-MCA-LDW

Dear Judge Wettre:

This firm, together with Sidney Austin LLP, represents Defendants LG Electronics, Inc., LG Electronics USA, Inc. and LG Electronics MobileComm USA, Inc. ("Defendants") in the above-referenced matter. Enclosed for the Court's consideration is a Stipulation and proposed Order further extending the time within which Defendants may reply, plead, or otherwise respond to Plaintiff's Complaint up to and including April 9, 2018.

If the proposed Stipulation and Order is acceptable to Your Honor, we respectfully request its entry. The Court's consideration is greatly appreciated.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

w/ enclosure

cc: All Counsel of Record (via ECF and E-Mail)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PARKERVISION, INC.,)	
)	
Plaintiff,)	
v.)	
)	
LG ELECTRONICS, INC., LG)	CIVIL ACTION NO. 2:17-CV-05359-
ELECTRONICS U.S.A., INC., and LG)	MCA-LDW
ELECTRONICS MOBILECOMM U.S.A,)	
INC.,)	
Defendants.)	
)	
)	

Whereas, Plaintiff ParkerVision, Inc. (“Plaintiff”) served the Complaint on Defendants LG Electronics U.S.A., Inc. and LG Electronics MobileComm U.S.A., Inc. on October 17, 2017; and

Whereas Plaintiff has not served the Complaint on LG Electronics, Inc.; and

Whereas, pursuant to a Stipulation and Order (Dkt. 15), LG Electronics, Inc., a Korean corporation, agreed to waive service of the summons of Plaintiff’s Complaint pursuant to Federal Rule of Civil Procedure 4(d), in exchange for Plaintiff allowing LG Electronics, Inc., LG Electronics U.S.A., Inc. and LG Electronics MobileComm U.S.A., Inc. (“Defendants”), until March 7, 2018 to respond in any manner, including by way of answer, motion or other pleading of any type to Plaintiff’s Complaint; and

Whereas, the parties have further agreed subject to the approval of this Court to be bound by the final claim construction order entered in *ParkerVision, Inc. v. Apple Inc., et al.*, 3:15-cv-1477-BJD-JRK (M.D. Fla), and to stay this action until Plaintiff’s action against Qualcomm and Apple (3:15-cv-1477) is resolved with a decision that is final; and

Whereas, the parties wish to extend the time to answer to permit the parties to finalize reducing the joint Stipulation to Stay in writing.

IT IS NOW FURTHER STIPULATED AND AGREED, subject to the approval of the Court, that:

The deadline for all Defendants to answer, move, or otherwise respond to Plaintiff's Complaint is extended through and including April 9, 2018.

DATED: March 1, 2018

By: /s/ Scott A. Rader
Scott A. Rader
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO PC
New York, NY 10017
Tel: (212) 935-3000

and

Pro hac vice applications forthcoming:

Michael T. Renaud
James M. Wodarski
William A. Meunier
Michael J. McNamara
Samuel F. Davenport
Daniel B. Weinger
Kristina R. Cary
Matthew S. Galica
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO PC
Boston, MA 02111
Tel: (617) 542-6000
Attorneys for ParkerVision, Inc.

By: /s/ Liza M. Walsh
Liza M. Walsh
Marc D. Haefner
WALSH PIZZI O'REILLY FALANGA LLP
1037 Raymond Blvd.
Suite 600
Newark, NJ 07102
Telephone: (973) 757-1100

and

Brian R. Nester
Michael R. Franzinger
Wonjoo Suh
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
Telephone: (202) 736-8000
*Attorneys for LG Electronics, Inc., LG
Electronics U.S.A., Inc., and LG Electronics
MobileComm U.S.A, Inc.*

SO ORDERED this ____ day of _____, 2018

HONORABLE LEDA D. WETTRE, U.S.M.J.