

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

IMAGE PROCESSING TECHNOLOGIES,
LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., ET
AL.,

Defendants.

Case No. 2:20-CV-00050-JRG-RSP

BEFORE: Hon. Rodney Gilstrap

**SAMSUNG'S STATEMENT IN RESPONSE TO
PLAINTIFF'S MOTION TO CONTINUE**

Samsung takes no position on plaintiff IPT's motion to continue. Samsung has been working diligently toward a July 6 trial date, including bringing witnesses and counsel to Marshall. But Samsung also appreciates the current public health situation and will abide by the Court's orders and preferences without objection.

Samsung has been making all necessary preparations and will be ready to appear for trial consistent with this Court's prior orders. Many counsel and witnesses have already traveled to Texas and have been taking recommended precautions. Those precautions have included following CDC guidelines that include two weeks of self-quarantine immediately upon arrival in the United States from certain countries. Most of Samsung's trial team is now in Marshall.

Samsung, however, is also mindful of the challenges posed by the current pandemic. Samsung recognizes the importance of protecting the health and safety of jurors and prospective jurors, the Court and its staff, witnesses, the parties, and their counsel. Samsung has no desire to endanger the well-being of anyone, particularly anyone in public service. Samsung anticipates that

the Court has taken, and will continue to take, necessary precautions to protect as much as possible the health of everyone involved in the trial.

Samsung will understand and not object if the Court concludes that public safety is best protected by continuing the trial. If that is the Court's decision, however, Samsung respectfully requests that the trial not be rescheduled for August, as IPT has proposed, and instead be rescheduled for a later date when quarantining of visitors from overseas will foreseeably no longer be necessary. Certain of Samsung's witnesses and representatives have already traveled to the United States and some have been self-quarantining. Several will have to quarantine for an additional two weeks when they return to their home countries. It would therefore be a hardship for them to complete quarantine in their home countries only to have to turn around and return to the United States to begin the cycle again.

Dated: June 29, 2020

Respectfully submitted,

/s/ Darin W. Snyder

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email on June 29, 2020.

/s/ Darin W. Snyder
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