

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

VL COLLECTIVE IP LLC,

Plaintiff,

V.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 2:26-cv-00346-JRG

JURY TRIAL DEMANDED

DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF PROTECTIVE ORDER

DEADLINE

Microsoft Corporation (“Defendant”) respectfully files this Unopposed Motion for Extension of the deadlines for the Protective Order. The deadline for the Defendant to submit its proposed Protective Order was set as August 10, 2026 (Dkt. 30). On August 7, 2026, the Plaintiff VL Collective IP LLC (“Plaintiff”) and Defendant moved to extend this deadline to August 28, 2026 (Dkt. 33). Defendant hereby requests an extension of this deadline by two additional business days to September 2, 2026.

Defendant represents that the extension requested herein is not sought for the purposes of delay but rather so the parties can eliminate disputes associated with the proposed protective order, with a goal of submitting an agreed-upon protective order. Plaintiff and Defendant are diligently meeting and conferring in this regard. This proposed extension does not affect any other deadline.

Dated: August 27, 2026

/s/ Melissa R. Smith

Natalie A. Bennett*

Illinois State Bar No. 6304611

natalie.bennett@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, NW

Washington, D.C. 20004-2541

T. 202.739.3000

F. 202.739.3001

Ahren C. Hsu-Hoffman

Texas Bar No. 24053269

ahren.hsu-hoffman@morganlewis.com

Jason E. Gettleman*

California Bar No. 269733

jason.gettleman@morganlewis.com

Katerina Hora Jacobson*

California Bar No. 342384

katerina.horajacobson@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1400 Page Mill Road

Palo Alto, CA 94304

T. 650.843.4000

F. 650.843.4001

Melissa R. Smith

State Bar No. 24001351

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

**Admitted to Practice*

***Attorneys for Defendant Microsoft
Corporation***

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 the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this August 27, 2026.

/s/ *Melissa R. Smith*

Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the parties have complied with the meet and confer requirement in Local Rule CV-7(h). This motion unopposed.

/s/ *Melissa R. Smith*

Melissa R. Smith