

**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

**MICROSOFT’S UNOPPOSED MOTION FOR EXTENSION TO SERVE ITS
INVALIDITY CONTENTIONS, ACCOMPANYING DOCUMENT PRODUCTION, AND
SUBJECT MATTER ELIGIBILITY CONTENTIONS**

Microsoft files this Unopposed Motion for Extension of Time to comply with P.R. 3-3 (Invalidity Contentions) and P.R. 3-4 (Document Production Accompanying Invalidity Contentions) and to comply with the Court’s Standing Order regarding Subject Matter Eligibility Contentions as follows:

Deadline	Current Date	New Date
Comply with P.R. 3-3 (Invalidity Contentions) & 3-4 (Document Production Accompanying Invalidity Contentions)	09/14/2026	09/24/2026
Comply with Standing Order Regarding Subject-Matter Eligibility Contentions	09/14/2026	09/24/2026

Microsoft’s Invalidity Contentions pursuant to P.R. 3-3, accompanying document production pursuant to P.R. 3-4, and Subject Matter Eligibility Contentions are currently due by September 14, 2026, as set by the Court’s July 23, 2026 Order granting a prior extension of this deadline (Dkt. 29). Microsoft respectfully requests that the Court extend this deadline by ten days, including September 24, 2026. Plaintiff VL Collective IP LLC does not oppose this extension.

This requested extension of time is not for the purpose of delay and will not prejudice the parties.

Date: September 4, 2026

Respectfully submitted,

/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

James Travis Underwood

State Bar No. 24102587

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

travis@gillamsmithlaw.com

**Admitted to Practice*

Attorneys for Defendant Microsoft Corporation

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on , a true and correct copy of the foregoing document was served on all counsel of record who have appeared in this case via the Court's CM/ECF system per Local Rule CV-5.

/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