

IN THE
SUPREME COURT OF THE UNITED STATES

GOTECH INTERNATIONAL TECHNOLOGY LIMITED; ZHUHAI GOTECH INTELLIGENT
TECHNOLOGY COMPANY LIMITED,

Petitioners,

v.

NAGRAVISION SA,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Fifth Circuit

**APPLICATION FOR FURTHER EXTENSION OF TIME TO FILE
A PETITION FOR A WRIT OF CERTIORARI**

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**APPLICATION FOR FURTHER EXTENSION OF TIME TO FILE A
PETITION FOR A WRIT OF CERTIORARI FROM JULY 10, 2018 TO JULY
26, 2018**

To: Justice Samuel A. Alito, Jr., Circuit Justice for the United States Court of Appeals for the Fifth Circuit.

1. Pursuant to this Court’s Rules 13.5 and 22, Applicants Zhuhai Gotech Intelligent Technology Company Limited and Gotech International Technology Limited (“Applicants”) request a further extension of sixteen (16) days to file a petition for a writ of certiorari in this case. Applicants’ petition will challenge the decision of the Fifth Circuit in *Nagravision SA v. Gotech International Technology Limited*, 882 F.3d 494 (5th Cir. 2018), a copy of which is attached to Applicants’ initial Application, filed May 24, 2018.

2. The Fifth Circuit issued its opinion on February 7, 2018 and denied Applicants’ timely petitions for rehearing and rehearing *en banc* on March 12, 2018.

3. On May 29, 2018, the Court granted Applicants’ application to extend the time to file a petition for a writ of certiorari from June 10, 2018 to July 10, 2018. Consequently, without an extension, Applicants’ petition for a writ of certiorari would be due on July 10, 2018. With the requested extension, the petition would be due on July 26, 2018. This Court’s jurisdiction will be based on 28 U.S.C. § 1254(1). In accordance with Sup. Ct. R. 13.5, Applicants are filing this application at least ten days before the current due date.

4. As explained in Applicants’ initial Application, this case is a serious candidate for review. It involves two interrelated circuit splits regarding FED. R.

CIV. P. 4(k)(2): the first concerns the pleading requirements and burden of proof under that rule, and the second concerns what a defendant must do to vacate a default judgment for lack of personal jurisdiction under that rule. This case presents an ideal vehicle for this Court to resolve these important and recurring decisional conflicts.

5. This application for a 16-day extension is not filed for purposes of delay. Because of the importance of this case, Applicants have retained new lead counsel for Supreme Court proceedings: Jeffrey L. Fisher at O'Melveny & Myers LLP. This modest, additional extension is needed so that undersigned counsel and other members of the firm may continue to familiarize themselves with the record, the decisions below, and the relevant rules and case law. Mr. Fisher also has primary responsibility for several other matters currently pending before this Court, including two merits cases in which briefs are due on July 5 and 15, respectively.

See Mt. Lemmon Fire Dist. v. Guido (No. 17-587); *Jam v. International Finance Corporation* (No. 17-1011). Accordingly, the time sought here is necessary for new counsel to adequately prepare Applicants' petition for a writ of certiorari.

For these reasons, Applicants request the entry of an order extending their time to file their petition for a writ of certiorari until July 26, 2018.

Respectfully submitted,

By: /s/ Jeffrey L. Fisher

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Dated: June 26, 2018