

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

BULLETPROOF PROPERTY
MANAGEMENT LLC,

Plaintiff,

v.

TESLA, INC.; JOHN DOES Nos. 1-20,
Unknown persons,

Defendants.

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Civil Action No. 1:25-cv-00665

NOTICE OF VENUE OR JURISDICTIONAL DISCOVERY

Plaintiff Bulletproof Property Management LLC files this Notice of Venue or Jurisdictional Discovery. In support of this Notice, Plaintiff shows the Court the following:

On July 21, 2025, Defendant Tesla, Inc. filed its Opposed Motion to Transfer Venue to the Northern District of California. Dkt. 13.

Paragraph V of this Court’s Standing Order Governing Procedures (OGP 4.3) – Patent Cases states, in part, that “[v]enue or jurisdictional discovery automatically opens upon the filing of an initial venue or jurisdictional motion and shall be completed no later than 10 weeks after the filing of such motion.” According to the Local Rules for the Western District of Texas and this Court’s rulings interpreting the same, “Ordinarily, non-movants have 14 days to file a response to a motion.” *Traxcell Techs., LLC v. Google LLC*, No. 6:21-CV-1312-ADA, 2022 WL 3593054, at *1 (W.D. Tex. Aug. 22, 2022) (citing Local Rule CV-7(D)(1)).

On this date, however, pursuant to Paragraph V of the Court’s Standing Order, Plaintiff files the instant “notice of venue or jurisdictional discovery.” OGP 4.3 ¶ V. Consequently, and by doing so, Plaintiff hereby moves the “filing deadline for a response,” *Traxcell*, 2022 WL 3593054,

until at least October 13, 2025, which is “2 weeks after the completion of venue or jurisdictional discovery.” OGP 4.3 ¶ VI.

Dated: August 1, 2025

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF
BULLETPROOF PROPERTY MANAGEMENT LLC

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 the Court's CM/ECF system per Local Rule on this 1st day of August 2025. Any other counsel of record will be served by facsimile transmission or first class mail.

/s/Christopher M. Joe
Christopher M. Joe