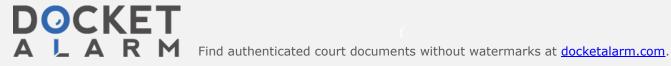
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5	UNITED STATES DISTRICT COURT	
6	NORTHERN DISTRICT OF CALIFORNIA	
7	OAKLAND DIVISION	
.8		
9	ZTE (USA) INC.,	CASE NO. 4:18-cv-06185-HSG (Former Case No. 2:17-cv-00517-JRG) (E.D. Tex.)
20	Plaintiff,	
21	v.	ADMINISTRATIVE MOTION TO REMOVE FILED DOCUMENTS FROM CASE FILE AND DOCKET
22	AGIS SOFTWARE DEVELOPMENT LLC,	
23	Defendants.	
24	Detendants.	
25		
26		
27		
	1	



Pursuant to Civil Local Rule 7-11, Plaintiff ZTE (USA) Inc. ("ZTE") hereby moves for administrative relief to have the following documents removed from the case file and docket:

• Dkt. Nos. 42-4, 42-6, 42-7, 42-8, 42-9, 42-10, 42-11, 42-12, 42-13, and 42-14; the originally filed highlighted ZTE's Response to Motion to Dismiss Second Amended Complaint ("Response"), the originally filed highlighted Declaration of Bradford C. Schulz in Support of the Response, and the originally filed Exhibits 3, 4, 5, 6, 8, 10, 14, and 34. Hereinafter, the "Documents."

The Documents contain information designated "RESTRICTED – ATTORNEYS' EYES ONLY" by Defendant AGIS Software Development LLC ("AGIS") in *AGIS Software Development LLC v. ZTE Corporation et al.*, 2:17-cv-00517-JRG (E.D. Tex.) and are subject to a Protective Order. *See AGIS Software Development, LLC v. Huawei Device USA Inc., et al*, Case No. 2:17-cv-00513 (Lead Case), Dkt. No. 119.

ZTE and AGIS disagree over the interpretation of this Protective Order. Nevertheless, upon notification of this disagreement, ZTE agreed to withdraw the Documents from the case and to follow this Court's procedure for blocking access to the Documents.

As set for in the accompanying Declaration, AGIS failed to provide consent that the Documents be removed from the file and docket by the provided March 11, 2019 deadline.

Accordingly, ZTE respectfully requests that the Court enter an order removing the Documents from the record.

Dated: March 11, 2019 FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP

By: /s/ Bradford C. Schulz
Bradford C. Schulz

Attorneys for Plaintiff ZTE (USA) Inc.

