

1 Michael Liu Su (SBN 300590)
michael.liu.su@finnegan.com
2 FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
3 3300 Hillview Avenue
4 Palo Alto, CA 94304
Telephone: (650) 849-6600
5 Facsimile: (650) 849-6666

6 Lionel M. Lavenue (*pro hac vice*)
lionel.lavenue@finnegan.com
7 Bradford C. Schulz (*pro hac vice*)
bradford.schulz@finnegan.com
8 FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
9 Two Freedom Square
10 11955 Freedom Drive
Reston, VA 20190
11 Telephone: (571) 203-2700
12 Facsimile: (202) 408-4400

13 Attorneys for Plaintiff
ZTE (USA) Inc.

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

19 ZTE (USA) INC.,
20 Plaintiff,
21 v.
22 AGIS SOFTWARE DEVELOPMENT LLC,
23 Defendants.

CASE NO. 4:18-cv-06185-HSG
(Former Case No. 2:17-cv-00517-JRG)
(E.D. Tex.)

**ADMINISTRATIVE MOTION TO
REMOVE FILED DOCUMENTS
FROM CASE FILE AND DOCKET**

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

- 3 • 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
4 filed highlighted ZTE’s Response to Motion to Dismiss Second Amended Complaint
5 (“Response”), the originally filed highlighted Declaration of Bradford C. Schulz in Support
6 of the Response, and the originally filed Exhibits 3, 4, 5, 6, 8, 10, 14, and 34. Hereinafter,
7 the “Documents.”

8 The Documents contain information designated “RESTRICTED – ATTORNEYS’ EYES
9 ONLY” by Defendant AGIS Software Development LLC (“AGIS”) in *AGIS Software Development*
10 *LLC v. ZTE Corporation et al.*, 2:17-cv-00517-JRG (E.D. Tex.) and are subject to a Protective
11 Order. *See AGIS Software Development, LLC v. Huawei Device USA Inc., et al*, Case No. 2:17-cv-
12 00513 (Lead Case), Dkt. No. 119.

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

16 As set for in the accompanying Declaration, AGIS failed to provide consent that the
17 Documents be removed from the file and docket by the provided March 11, 2019 deadline.
18 Accordingly, ZTE respectfully requests that the Court enter an order removing the Documents from
19 the record.

20 Dated: March 11, 2019

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP

21
22
23 By: /s/ Bradford C. Schulz
Bradford C. Schulz
24 Attorneys for Plaintiff
25 ZTE (USA) Inc.
26
27
28