

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	C.A. No. 15-542-JFB-SRF
)	
v.)	JURY TRIAL DEMANDED
)	
APPLE, INC.,)	
)	
Defendant.)	
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EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	C.A. No. 15-545-JFB-SRF
)	
v.)	JURY TRIAL DEMANDED
)	
SAMSUNG ELECTRONICS CO., LTD. and)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
)	
Defendants.)	

**DEFENDANTS APPLE INC.’S, SAMSUNG ELECTRONICS CO., LTD.’S AND
SAMSUNG ELECTRONICS AMERICA, INC.’S JOINT MOTIONS *IN LIMINE***

Defendants’ Apple Inc., Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants”) respectfully move for an order granting the following motions *in limine*:

- I. Motion *In Limine* No. 1: Preclude Evolved From Offering Evidence Regarding How Evolved Arrived At Its \$0.25 Per-Device Figure
- II. Motion *In Limine* No. 2: Preclude Dr. Cooklev And Evolved From Arguments, Evidence, And Testimony Regarding Infringement Under The Doctrine Of Equivalents

- III. Motion In Limine No. 3: Exclude Any Testimony Regarding Evidence Of, Or Reference To, The PTAB'S Decision Not To Institute IPR Proceedings Against The '373 Patent
- IV. Motion In Limine No. 4: Exclude Any Testimony Or Declarations From Any LG Electronics Witness
- V. Motion In Limine No. 5: Exclude Irrelevant Evidence Of Financial Resources And Size, As Well As Unfairly Prejudicial Dollar Amounts Of Sales Of Accused Products
- VI. Motion In Limine No. 6: Preclude Evolved From Relying On Documents Produced And Fact Testimony Disclosed More Than A Year After The Close Of Fact Discovery

The grounds for these motions *in limine* are fully set forth in Defendants' Opening Brief, filed concurrently herewith. The parties conferred pursuant to D. Del. LR 7.1.1, and Evolved will oppose these motions.

Respectfully Submitted,

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