

Exhibit 2116

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CALLWAVE COMMUNICATION LLC, : CA NO. 12-1701-RGA
: 12-1702-RGA
Plaintiff, : 12-1703-RGA
September 16, 2014

v.

:
: 1:36 o'clock p.m.
AT&T MOBILITY LLC, et al., :
:
Defendants, :
.....:
:

TRANSCRIPT OF DISCOVERY DISPUTE
BEFORE THE HONORABLE RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For Plaintiff: PEPPER HAMILTON LLP
BY: EDMOND D. JOHNSON, ESQ
BY: GREGORY S. BISHOP, ESQ

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BY: WILLIAM D. BELANGER, ESQ

For Defendants: MORRIS, NICHOLS, ARSHT & TUNNELL

BY: KAREN JACOBS, ESQ

-and-

DENTONS LLP

BY: KIRK R. RUTHENBERG, ESQ

For Defendant Sprint

CONNOLLY GALLAGHER LLP

BY: ARTHUR G. CONNOLLY, III, ESQ

-and-

DENTONS LLP

BY: KIRK R. RUTHENBERG, ESQ

For Defendant T-Mobile

SEITZ ROSS ARONSTAM & MORITZ

BY: BENJAMIN J. SCHLADWEILER, ESQ

For Defendant AT&T

MORRIS, NICHOLS, ARSHT & TUNNELL

BY: PAUL SAINDON, ESQ

For Defendant Google

Court Reporter: LEONARD A. DIBBS

1 of that indemnification or other communications about
2 indemnification.

3 For example, let's say that AT&T, we heard this morning
4 that they're only partially indemnifying, that Location Labs is
5 only partially indemnifying AT&T.

6 THE COURT: Okay. So, let's say they are only
7 partially indemnifying.

8 What do you think you might find in these letters that
9 you aren't going to get in your other -- wait. Hold on a
10 second.

11 So, are you not producing these additional things that
12 Mr. Bishop is talking about, because they're privileged, or
13 they're irrelevant, or they don't exist, or some combination of
14 the three?

15 MR. RUTHENBERG: Some combination of that, your Honor.

16 No. 1, I am not aware of any communications after the
17 acceptance of the defense by Location Labs regarding
18 indemnification, between Location Labs and any of the
19 defendants.

20 THE COURT: And if there were interim communications
21 before it was accepted, instead of, here's our request, and
22 here's an acceptance, if there was a some back and forth before
23 Location Labs accepted, is that what you have committed to
24 provide?

25 MR. RUTHENBERG: We are willing to produce that, as