IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

CHRIMAR SYSTEMS, INC., D/B/A CMS	§	
TECHNOLOGIES AND CHRIMAR	§	Civil Action No. 6:15-CV-618-JRG-JDL
HOLDING COMPANY, LLC,	§	LEAD CASE
Plaintiffs,	§	
v.	§	
	§	JURY TRIAL DEMANDED
ADTRAN, INC.,	§	
Defendant.	§	
	§	
	§	
CHRIMAR SYSTEMS, INC., D/B/A CMS	§	
TECHNOLOGIES AND CHRIMAR	§	Civil Action No. 6:15-cv-00639-JRG-JDL
HOLDING COMPANY, LLC,	§	CONSOLIDATED CASE
Plaintiffs,	§	
v.	§	
	§	JURY TRIAL DEMANDED
DELL INC. AND AEROHIVE	§	
NETWORKS, INC.,	§	
Defendants.	§	
	§	

DEFENDANT DELL INC.'S OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST

Pursuant to the Court's Docket Control Order entered in this case, Defendant Dell Inc. (hereinafter, "Dell") respectfully submits its objections to Plaintiffs' Exhibit List attached hereto as Appendix A. Dell reserves the right to supplement these objections.



Respectfully submitted,

By: /s/ Gilbert A. Greene

Gilbert A. Greene

State Bar No. 24045976

Paul D. Trahan

State Bar No. 24003075

James G. Warriner

State Bar No. 24070813

Stephanie N. DeBrow

State Bar No. 24074119

NORTON ROSE FULBRIGHT US LLP

98 San Jacinto Boulevard, Suite 1100

Austin, TX 78701 Tel: 512.474.5201

Fax: 512.536.4598

bert.greene@nortonrosefulbright.com paul.trahan@nortonrosefulbright.com jim.warriner@nortonrosefulbright.com stephanie.debrow@nortonrosefulbright.com

Dan D. Davison State Bar No. 05590900 NORTON ROSE FULBRIGHT US LLP 2200 Ross Ave., Suite 3600 Dallas, TX 75201

Tel: 214.855.8000 Fax: 214.855.8200

dan.davison@nortonrosefulbright.com

Deron R. Dacus THE DACUS FIRM, P.C. 821 ESE Loop 323, Suite 430

Tyler, Texas 75701 Tel: (903) 705-1117 Fax: (903) 705-1117 ddacus@dacusfirm.com

COUNSEL for DEFENDANT DELL, INC.



CERTIFICATE OF SERVICE

I certify that this document and all attachments thereto were served via email to Plaintiffs' counsel of record on **November 7, 2016**.

/s/ Gilbert A. Greene
Gilbert Greene



APPENDIX A



Dell Inc.'s Objections to Plaintiffs' Exhibit List

PLTF. EXH. NO.	DESCRIPTION	BEG. BATES NO. or DEPO EX. NO.	END BATES NO.	DEFENDANTS' OBJECTIONS
				As to the discovery responses and initial disclosu
	Defendants' Discovery Responses and Initial Disclosures			following objections: R, P, F, H, IP
				As to its own discovery responses Dell maintains
Discovery Defe				responses themselves. Additionally, to the exten
				entry encompasses documents cited in Dell's dis
				entry as compound and reserves all objections to
				specific identification of such documents by Plai
PTX-001	United States Patent No. 8,155,012 B2			,
PTX-002	United States Patent No. 8,942,107 B2			
PTX-003	United States Patent No. 8,902,760 B2			
PTX-004	United States Patent No. 9,019,838 B2			
PTX-005	Provisional Application for U.S. Patent 60/081,279	CMS000006	CMS000026	
PTX-006	United States Patent No. 5,406,260	CMS016442	CMS016449	
PTX-007	United States Patent No. 7,457,250			
PTX-008	IEEE 802.3af-2003, June 18, 2003	CMS125157	CMS125288	
PTX-009	IEEE 802.3af-2009, October 30, 2009	CMS012440	CMS012580	
PTX-010	Letter from G. Schively to Marshall Cummings, January 23, 1998	CMS297929	CMS297930	
PTX-011	Letter from Clyde Boenke to Marshall Cummings, February 10, 1998	CMS002551	CMS002552	
PTX-012	Letter from Clyde Boenke to Marshall Cummings, March 6,	CMS001823	CMS001825	
1998	1998	CMS116584 CMS002519	CMS116586 CMS002528	
PTX-013	Letter from Clyde Boenke to Marshall Cummings, March 11,	CMS002519 CMS111637	CMS002528 CMS111646	
19	1998	BOENKE-00054	BOENKE-00056	
PTX-014	Letter C. Boenke to M. Cummings, March 17, 1998	CMS001821	CMS001822	
PTX-015	Handwritten notes, March 13, 1998	CMS002739	CMS002739	R, P, H, F, AU
PTX-016 (CMS IWATCH, Schematic	Boenke-0000010	Boenke-0000011	The document bearing Bates numbers BOENKE-
				description of this exhibit provided by Chrimar.
				identify and review this exhibit. Dell reserves all
				identification of the document to Dell by Chrima
PTX-017	EtherLock II (Physical Exhibit)			R, P
PTX-018	ELID/NIC stick (Physical Exhibit)			R, P
PTX-019	Demonstration PC (Physical Exhibit)			R, P
PTX-020	"CMS Technologies, Arbor Partners Announce Financing, Advisory Relationship," Press Release, January 26, 1998	CMS227271	CMS227272	R, P, H, F
PTX-021	Confidential Information and Inventions Agreement by and	CMS088025	CMS088026	
	between CMS Technologies and Clyde Boenke, February 3, 1998			R, P, H, F
PTX-023	Secrecy and Invention Agreement by and between CMS	CMS002562	CMS002562	
	Technologies and Wisne Design/Pico Engineering, April 13, 1998	CMS116587	CMS116587	R, P, H, F
	Letter from Clyde Boenke to Marshall Cummings, April 15,			
PTX-024	1998	CMS002678	CMS002678	
PTX-025	Email from John Austermann to Peter Gray, April 18, 1998	CMS298004	CMS298008	
PTX-026	Email from John Austermann, April 23, 1998	CMS297990	CMS297994	R, P, H
PTX-027	CMS Technologies Sales Order Number SO- 11277, August 18, 1998	CMS284915	CMS284915	R, P, H, F
PTX-028	"CMS Technologies Introduces First Solution to Fill Inventory GAP in Asset Management," Press Release, 11/1/1998	CMS116593	CMS116594	R, P, H, F



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

