

**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.	§	
	§	
ADTRAN, INC.,	§	JURY TRIAL DEMANDED
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.

November 7, 2016

Respectfully submitted,

By: /s/ Gilbert A. Greene

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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
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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
Discovery	Defendants' Discovery Responses and Initial Disclosures			As to the discovery responses and initial disclosures following objections: R, P, F, H, IP As to its own discovery responses Dell maintains responses themselves. Additionally, to the extent entry encompasses documents cited in Dell's discovery entry as compound and reserves all objections to specific identification of such documents by Plaintiff.
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, 1998	CMS001823 CMS116584	CMS001825 CMS116586	
PTX-013	Letter from Clyde Boenke to Marshall Cummings, March 11, 1998	CMS002519 CMS111637 BOENKE-00054	CMS002528 CMS111646 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 Chrimar
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 between CMS Technologies and Clyde Boenke, February 3, 1998	CMS088025	CMS088026	R, P, H, F
PTX-023	Secrecy and Invention Agreement by and between CMS Technologies and Wisne Design/Pico Engineering, April 13, 1998	CMS002562 CMS116587	CMS002562 CMS116587	R, P, H, F
PTX-024	Letter from Clyde Boenke to Marshall Cummings, April 15, 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

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