

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

GUI GLOBAL PRODUCTS, LTD. d/b/a  
GWEE

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.  
AND SAMSUNG ELECTRONICS  
AMERICA, INC.

Defendants.

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Civil No. 4:20-cv-02624

**JURY TRIAL DEMANDED**

**RESPONSE TO JOINT MOTION TO CONSOLIDATE**

Apple Inc. (“Apple”) files this Response to the Joint Motion to Consolidate this case, No. 4:20-cv-2652, with Plaintiff GUI Global Products’ (“GUI”) case against Apple, Case No. 4:20-cv-2652. Dkt. 39. Apple’s position is that this Motion to Consolidate should not be considered until after the Court has ruled upon Apple’s forthcoming Motion to Transfer Venue and accompanying Motion to Stay pending decision thereon (*see* Dkt. Nos. 34, 36 in Case No. 4:20-cv-2652), as the decision on Apple’s Motion to Transfer may render moot the Motion to Consolidate.

Date: October 27, 2020

Respectfully submitted,  
FISH & RICHARDSON P.C.

By: /s/ Benjamin C. Elacqua  
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**COUNSEL FOR DEFENDANT APPLE INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record via the Court's CM/ECF system on the 27th day of October, 2020.

/s/ Benjamin C. Elacqua