

No. 23-\_\_\_\_\_

---

---

**UNITED STATES COURT OF APPEALS  
for the FEDERAL CIRCUIT**

---

IN RE: DODOTS LICENSING SOLUTIONS LLC,  
*Petitioner.*

---

On Petition for Writ of Mandamus to the United States  
District Court for the Western District of Texas in Case  
No. 6:22-cv-00533-ADA, Judge Alan D Albright

---

**DODOTS LICENSING SOLUTIONS LLC'S MOTION TO  
WAIVE CONFIDENTIALITY REQUIREMENTS**

---

RONALD M. DAIGNAULT\*  
CHANDRAN B. IYER  
JASON S. CHARKOW\*  
SCOTT R. SAMAY\*  
RICHARD JUANG\*  
ZACHARY H. ELLIS\*  
DAIGNAULT IYER LLP  
8618 WESTWOOD CENTER DR - SUITE 150  
VIENNA VA 22182  
rdaignault@daignaultiyer.com  
cbiyer@daignaultiyer.com  
jcharkow@daignaultiyer.com  
ssamay@daignaultiyer.com  
rjuang@daignaultiyer.com  
zellis@daignaultiyer.com

*\*Not admitted in Virginia*

*Counsel for DoDots Licensing Solutions, LLC.*

RAYMOND W. MORT, III  
THE MORT LAW FIRM, PLLC  
501 CONGRESS AVENUE  
SUITE 150  
AUSTIN, TX 78701  
raymort@austinlaw.com

SEPTEMBER 29, 2023

---

**UNITED STATES COURT OF APPEALS  
FOR THE FEDERAL CIRCUIT**

**CERTIFICATE OF INTEREST**

**Case Number** 23-

**Short Case Caption** In re: DoDots Licensing Solutions LLC

**Filing Party/Entity** DoDots Licensing Solutions LLC

**Instructions:**

1. Complete each section of the form and select none or N/A if appropriate.
2. Please enter only one item per box; attach additional pages as needed, and check the box to indicate such pages are attached.
3. In answering Sections 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance.
4. Please do not duplicate entries within Section 5.
5. Counsel must file an amended Certificate of Interest within seven days after any information on this form changes. Fed. Cir. R. 47.4(c).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: 09/29/2023

Signature: /s/ Ronald M. Daignault

Name: Ronald M. Daignault

FORM 9. Certificate of Interest

Form 9 (p. 2)  
March 2023

<b>1. Represented Entities.</b> Fed. Cir. R. 47.4(a)(1).	<b>2. Real Party in Interest.</b> Fed. Cir. R. 47.4(a)(2).	<b>3. Parent Corporations and Stockholders.</b> Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities.  <input checked="" type="checkbox"/> None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities.  <input checked="" type="checkbox"/> None/Not Applicable
DoDots Licensing Solutions LLC		

Additional pages attached

**4. Legal Representatives.** List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

None/Not Applicable                       Additional pages attached

Daignault Iyer LLP: Shalu Maheshwari		

**5. Related Cases.** Other than the originating case(s) for this case, are there related or prior cases that meet the criteria under Fed. Cir. R. 47.5(a)?

Yes (file separate notice; see below)     No     N/A (amicus/movant)

If yes, concurrently file a separate Notice of Related Case Information that complies with Fed. Cir. R. 47.5(b). **Please do not duplicate information.** This separate Notice must only be filed with the first Certificate of Interest or, subsequently, if information changes during the pendency of the appeal. Fed. Cir. R. 47.5(b).

**6. Organizational Victims and Bankruptcy Cases.** Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

None/Not Applicable                       Additional pages attached


Under Federal Rule of Appellate Procedure 27 and Federal Circuit Rule 25.1(d)(3), Petitioner DoDots Licensing Solutions LLC (“DoDots”) respectfully moves to waive the confidentiality requirements of Federal Circuit Rule 25.1(d)(1)(A). In support of this Motion, DoDots states as follows:

1. Pursuant to 28 U.S.C. § 1651, DoDots petitions for a writ of mandamus to obtain relief from an order of United States District Judge Alan D Albright of the United States District Court for the Western District of Texas granting a motion to transfer filed by Apple Inc.

2. In the proceedings below, Apple marked information as “Confidential – Outside Attorney’s Eyes Only” pursuant to the district court’s protective order. The protective order is included in the Appendix accompanying DoDots’ Petition.

3. There is good cause for this request. While DoDots appreciates that Apple redacted a significant amount of material from the proceedings below, DoDots has no desire to disclose information that Apple deems highly confidential and related to its business practices. The confidential information contained in DoDots’ Petition is necessary to support DoDots’ argument that the district court clearly abused its discretion in transferring the case to the United States District Court for the Northern District of California. The confidential testimony of Apple’s employees demonstrates their relevance to the case and shows how the

# 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.