

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CYWEE GROUP LTD.,

Plaintiff

v.

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

Defendants.

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NO. 2:17-CV-00140-WCB-RSP

**DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG
ELECTRONICS AMERICA, INC.'S
REPLY IN SUPPORT OF MOTION FOR SANCTIONS**

“A pox on both your houses.” That appears to be the approach CyWee is urging the Court to take. But not all “contentious” cases are made that way by both sides. Sometimes one party steps over the line, at times well over it. That is the unfortunate situation here.

CyWee counsel Michael Shore’s transgressions are summarized in Samsung’s Motion.

[REDACTED]

[REDACTED] Respectfully, none of this is consistent with the culture and customs acceptable in any District. Even lawyers from places like Palo Alto, San Diego, and New York are entitled to seek relief when subjected to such misconduct. And local Texas lawyers are subject to discipline when they engage in it.

CyWee’s response leaves out key facts and events. First, none of this behavior is new or unusual for Mr. Shore. He was recently sanctioned by the District of Massachusetts for engaging in similar conduct in another case. As here, Mr. Shore was the problem. The court there recognized that and took action to address it. This Court should do the same.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In the end, in the face of denials, threats and sarcasm, Samsung made every attempt to avoid filing its Motion and, once it was filed, to withdraw it if CyWee would agree not to engage in misconduct going forward and have that agreement so ordered by the Court.

Mr. Shore Violated Rule 4.02(a): Under Rule 4.02(a), a lawyer cannot “cause or encourage” another to communicate with a represented party without the consent of the represented party’s lawyer. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Mr. Shore Violated the Protective Order: [REDACTED]

[REDACTED]

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