

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

JAWBONE INNOVATIONS, LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD., ET AL.

*Defendants.*

NO. 2:21-CV-0186-JRG-RSP

**PLAINTIFF JAWBONE INNOVATIONS, LLC AND SAMSUNG DEFENDANTS’  
JOINT MOTION TO REDACT LIMITED PORTIONS OF THE AUGUST 24, 2022  
HEARING TRANSCRIPT**

Plaintiff Jawbone Innovations, LLC (“Jawbone”) and Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung”) (collectively, the “Parties”), pursuant to this Protective Order in this case, Dkt. 43, respectfully move for an order by this Court that limited redactions be made to portions of the transcript of the hearing held August 24, 2022. The August 24 hearing involved discussion of confidential information about (1) Samsung witnesses, (2) Samsung products, (3) Samsung’s relationships and agreements with its third-party vendors; (4) litigation funding; and (5) Jawbone’s confidential agreements. At the time of this discussion, no public parties were present. Set forth below are the specific page and line numbers from the hearing transcript at which the confidential information was stated.

<b>Citation(s)</b>	<b>Summary</b>
5:10; 5:25; 6:4, 9, 11-12; 6:16-25; 9:25; 10:1	Reference to internal name for module of code in Samsung products
11:18; 5:8-9; 5:13-23; 10:1-8; 10:18-	Reference to confidential information about Samsung products

23; 24:4, 6, 15, 17-18; 30:20	
6:9; 11:10; 25:5, 9, 11; 35:1-2, 8; ; 36:13-14, 16	Reference to confidential information about Samsung's record-keeping practices
6:11-12, 16-25; 7:1, 8-12, 17-25; 8:3-14, 18-22; 9:1-6, 8-9, 11; 14:24; 16:23, 25; 17:2, 5; 21:1-2; 38:20-25; 39:1-10; 40:2-4; 42:24-25; 43:1, 20-22	Reference to Samsung witness names and/or confidential witness testimony
9:24	Reference to confidential information about record-keeping practices of Samsung third-party suppliers
10:9-23; 12:6-8; 28:12-14; 31:24-25; 32:1-4, 11-14; 33:3-7	Reference to confidential information about agreements between Samsung and third-party vendors
11:20-21	Reference to contents of confidential Samsung marketing documents
11:2-8, 10; 14:1, 7-8, 12-14, 17; 18:14-15, 18:23; 21:9; 26:24-25; 27:9-10, 16-18; 28:20; 29:18; 30:15; 31:8; 32:17; 34:18; 35:14-15; 37:5-6, 8, 17	Reference to confidential information about Samsung's relationships with third-party vendors
46:7; 13; 16; 21; 23; 25; 47:1; 3; 9; 18; 48:5; 50:4; 56:25; 57:8, 20; 58:1-2	References to litigation funding and litigation funding agreements.
51:9-17; 19-20; 22-25; 52:1-5; 21; 25; 53:1-3; 5-7; 54:14-17; 55:25-56:1;	References to contents of confidential Jawbone agreements.

In light of the foregoing, the Parties respectfully requests this Court to redact the  
aforementioned from the public trial record and move it to the sealed transcripts.

Dated: September 19, 2022

/s/ Alfred R. Fabricant

Alfred R. Fabricant  
NY Bar No. 2219392  
Email: ffabricant@fabricantllp.com  
Peter Lambrianakos  
NY Bar No. 2894392  
Email: plambrianakos@fabricantllp.com  
Vincent J. Rubino, III  
NY Bar No. 4557435  
Email: vrubino@fabricantllp.com  
**FABRICANT LLP**  
411 Theodore Fremd Avenue,  
Suite 206 South  
Rye, New York 10580  
Telephone: (212) 257-5797  
Facsimile: (212) 257-5796

Samuel F. Baxter  
Texas State Bar No. 01938000  
Email: sbaxter@mckoolsmith.com  
Jennifer L. Truelove  
Texas State Bar No. 24012906  
Email: jtruelove@mckoolsmith.com  
**MCKOOL SMITH, P.C.**  
104 E. Houston Street, Suite 300  
Marshall, Texas 75670  
Telephone: (903) 923-9000  
Facsimile: (903) 923-9099

**ATTORNEYS FOR PLAINTIFF  
JAWBONE INNOVATIONS, LLC**

/s/ Jin-Suk Park

Jin-Suk Park  
jin.park@arnoldporter.com  
Paul Margulies  
paul.margulies@arnoldporter.com  
**ARNOLD & PORTER KAYE SCHOLER LLP**  
601 Massachusetts Ave., NW

Washington, DC 20001-3743  
Telephone: (202) 942-5000  
Facsimile: (202) 942-5555

Patrick C. Reidy  
patrick.reidy@arnoldporter.com  
**ARNOLD & PORTER KAYE SCHOLER LLP**  
70 West Madison Street, Suite 4200  
Chicago, IL 60602  
Telephone: (312) 583-2424  
Facsimile: (312) 583-2360

Ryan M. Nishimoto  
ryan.nishimoto@arnoldporter.com  
Daniel S. Shimell  
daniel.shimell@arnoldporter.com  
**ARNOLD & PORTER KAYE SCHOLER LLP**  
777 South Figueroa Street, 44<sup>th</sup> Floor  
Los Angeles, CA 90017  
Telephone: (213) 243-4000  
Facsimile: (213) 243-4199

-and-

Melissa Smith  
melissa@gillamsmithlaw.com  
**GILLAM & SMITH LLP**  
303 South Washington Avenue  
Marshall, TX 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

*Attorneys for Samsung Electronics Co., Ltd. and  
Samsung Electronics America, Inc.*

**CERTIFICATE OF CONFERENCE**

On September 16, 2022, lead and local counsel for Samsung conducted a telephonic meet and confer with lead and local counsel for Plaintiff. Parties jointly submit this motion to redact limited portions of the August 24, 2022 hearing.

*/s/ Melissa R. Smith* \_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 19, 2022, I caused a copy of the foregoing to be served via the Court's ECF system on counsel of record.

*/s/ Melissa R. Smith* \_\_\_\_\_