

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

AGIS SOFTWARE DEVELOPMENT LLC, §
§ Case No. 2:22-cv-00443-JRG
§ (LEAD CASE)
§
Plaintiff, §
§
§ **JURY TRIAL DEMANDED**
§
v. §
§
HMD GLOBAL, ET AL., §
§
§
Defendants. §
§

AGIS SOFTWARE DEVELOPMENT LLC, §
§ Case No. 2:22-cv-00440-JRG
§ (MEMBER CASE)
§
Plaintiff, §
§
§ **JURY TRIAL DEMANDED**
§
v. §
§
ASUSTEK COMPUTER INC., ET AL., §
§
§
Defendants. §
§

AGIS SOFTWARE DEVELOPMENT LLC, §
§ Case No. 2:22-cv-00447-JRG
§ (MEMBER CASE)
§
Plaintiff, §
§
§ **JURY TRIAL DEMANDED**
§
v. §
§
PANASONIC CORPORATION, ET AL., §
§
§
Defendants. §
§

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

SONY CORPORATION, et al.,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

Case No. 2:22-cv-00448-JRG
(MEMBER CASE)

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF
AGREED PROTECTIVE ORDER**

Pursuant to the Court’s Docket Control Order dated December 19, 2023 (Dkt. 33), Plaintiff AGIS Software Development LLC (“Plaintiff” or “AGIS”) and Defendants HMD Global OY (“HMD Global OY”) and HMD America, Inc. (“HMD America”) (collectively, “HMD”); ASUSTek Computer Inc. (“ASUSTek Computer”) and ASUS Computer International (“ASUS Computer”) (collectively, “ASUS”); Panasonic Holdings Corporation, formerly known as Panasonic Corporation (“Panasonic Corp.”) and Panasonic Corporation of North America (“Panasonic Corp. of NA”) (collectively, “Panasonic”); and Sony Corporation formerly known as Sony Mobile Communications, Inc. (“Sony”) (all Defendants, collectively, “Defendants”) (Plaintiff and Defendants, collectively, the “Parties”) have met and conferred and hereby file this Joint Motion for Entry of Agreed Protective Order. Accordingly, the Parties respectfully request that the Court enter the Agreed Protective Order, attached hereto as Exhibit A.

Dated: January 8, 2024

Respectfully submitted,

/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

Justin Kurt Truelove
Texas Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

***ATTORNEYS FOR PLAINTIFF AGIS
SOFTWARE DEVELOPMENT LLC***

/s/ Matthew J. Moffa (w/ permission)

Matthew J. Moffa
NY Bar No. 5045067
Email: mmoffa@perkinscoie.com
William J. McCabe
NY Bar No. 2258085
Email: wmccabe@perkinscoie.com
PERKINS COIE LLP
1155 Avenue of the Americas, 22nd Floor
New York, NY 11036
Telephone: (212) 262-6900
Facsimile: (212) 977-1649

***COUNSEL FOR DEFENDANTS HMD
GLOBAL OY AND HMD AMERICA, INC.***

/s/ Chris R. Schmidt (w/ permission)

Eric. A. Buresh (admitted)
eric.buresh@eriseip.com
KS Bar No. 19895
Michelle L. Marriott (admitted)
michelle.marriott@eriseip.com
KS Bar No. 21784
Chris R. Schmidt (admitted)
chris.schmidt@eriseip.com
KS Bar No. 27833
ERISA IP, P.A.
7015 College Blvd., Ste 700
Overland Park, KS 66211
Telephone: (913) 777-5600

***COUNSEL FOR ASUSTEK COMPUTER INC.
AND ASUS COMPUTER INTERNATIONAL***

/s/ Trey Yarbrough (w/ permission)

Trey Yarbrough
Bar No. 22133500
Email: trey@yw-lawfirm.com
YARBROUGH WILCOX, PLLC
100 E. Ferguson, Suite 1015
Tyler, Texas 75702
Telephone: 903-595-3111
Facsimile: 903-595-0191

***ATTORNEY FOR DEFENDANTS
PANASONIC HOLDINGS CORPORATION
AND PANASONIC CORPORATION OF
NORTH AMERICA***

/s/ Charles T. Steenburg (w/ permission)

G. Blake Thompson
State Bar No. 24042033
Email: Blake@TheMannFirm.com

J. Mark Mann
State Bar No. 12926150
Email: Mark@TheMannFirm.com

MANN | TINDEL | THOMPSON
112 E. Line Street, Suite 304
Tyler, Texas 75702
Telephone: (903) 657-8540
Facsimile: (903) 657-6003

Charles T. Steenburg
MA Bar No. 663314
Email: csteenburg@wolfgreenfield.com

Marie A. McKiernan
MA Bar No. 689818
Email: mmckierman@wolfgreenfield.com

WOLF GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Facsimile: (617) 646-8546

***ATTORNEYS FOR DEFENDANT
SONY CORPORATION***

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.