

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

MAXELL LTD.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	Case No. 5:16-cv-00179-RWS
ZTE (USA) INC.,	§	
	§	<b>JURY TRIAL DEMANDED</b>
<i>Defendant.</i>	§	

---

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

For their Joint Motion to Stay all Deadlines and Notice of Settlement, Maxell Ltd. (“Maxell”) and ZTE (USA) Inc. (“ZTE”) respectfully state as follows:

All matters in controversy between the parties have been settled in principle. Accordingly, the parties request that the Court stay all pending deadlines for thirty days so that the appropriate dismissal papers may be submitted. The parties stipulate that if any issues arise prior to dismissal, the parties will submit those to the Court for final resolution. The parties make this request to allow for the orderly completion of their agreement and not for purposes of delay.

Because confidentiality is a material term of the parties’ agreement, the parties’ memorandum of understanding is filed under seal as Exhibit A pursuant to the Standing Order Regarding Proper Notification of Settlement to Court in Cases Pending Before Judge Robert Schroeder.

Respectfully submitted,

Dated: February 4, 2019

By: /s/ Geoff Culbertson

Geoffrey P. Culbertson  
Kelly Tidwell  
Patton, Tidwell & Culbertson, LLP  
2800 Texas Boulevard (75503)  
Post Office Box 5398  
Texarkana, TX 75505-5398  
Telephone: (903) 792-7080  
Facsimile: (903) 792-8233  
gpc@texarkanalaw.com  
kbt@texarkanalaw.com

Jamie B. Beaber  
Alan M. Grimaldi  
Kfir B. Levy  
James A. Fussell, III  
Baldine B. Paul  
Tiffany A. Miller  
William J. Barrow  
Saqib Siddiqui  
Brian C. Nese  
MAYER BROWN LLP  
1999 K Street, NW  
Washington, DC 20006  
Telephone: (202) 263-3000  
Facsimile: (202) 263-3300  
jbeaber@mayerbrown.com  
agrimaldi@mayerbrown.com  
klevy@mayerbrown.com  
jfussell@mayerbrown.com  
bpaul@mayerbrown.com  
tmiller@mayerbrown.com  
wbarrow@mayerbrown.com  
ssiddiqui@mayerbrown.com  
bnese@mayerbrown.com

Robert G. Pluta  
Amanda S. Bonner  
MAYER BROWN LLP  
71 S. Wacker Drive  
Chicago, IL 60606  
(312) 782-0600  
rpluta@mayerbrown.com  
asbonner@mayerbrown.com

*Counsel for Plaintiff Maxell, Ltd.*

/s/ Lionel M. Lavenue \_\_\_\_\_

Lionel M. Lavenue

Lionel M. Lavenue  
VA State Bar No. 49,005  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
Two Freedom Square  
11955 Freedom Drive  
Reston, VA 20190  
Phone: (571) 203-2700  
Fax: (202) 408-4400

ATTORNEY FOR DEFENDANT  
ZTE (USA) INC.

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 4th day of February, 2019, with a copy of this document via the Court's CM/ECF system.

*/s/ Geoff Culbertson* \_\_\_\_\_  
Geoffrey P. Culbertson

**CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL**

Pursuant to Local Rule CV-5 (a(7)(A) and Judge Robert Schroeder's Standing Order Regarding Proper Notification of Settlement, the undersigned counsel hereby certifies that authorization for filing under seal has been previously granted by the Court in this case.

/s/ Geoff Culbertson  
Geoffrey P. Culbertson