

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

MAXELL, LTD.,

Plaintiff

v.

APPLE INC.,

Defendant.

Civil Action No. 5:19-cv-00036-RWS

**JURY TRIAL DEMANDED**

**APPLE INC.'S UNOPPOSED MOTION TO REDACT THE  
SEPTEMBER 17, 2019 MOTIONS HEARING TRANSCRIPT**

Defendant Apple Inc. (“Apple”) requests that the Court redact a limited portion of the transcript from the September 17, 2019 motions hearing, which involved discussions of confidential (1) statements that revealed explicit details regarding Apple’s patent-licensing agreements with third parties. Each of these agreements is subject to a Non-Disclosure Agreement that requires Apple to maintain the confidentiality of information related thereto; and (2) the public disclosure of confidential details regarding Apple’s patent-licensing agreements with third-parties would harm the ability of Apple and said third-parties to protect the confidential nature of the agreements.

Apple respectfully requests that the Court redact the transcript as outlined below:

<b>Page(s):Line(s)</b>	<b>Description of portions to be filed under seal</b>
71:25	Reference to information derived from confidential patent license agreement with third-parties which is information protected under protective order.
77:3-4	Reference to information derived from confidential patent license agreement with third-parties which is information protected under protective order.

Plaintiff has represented that they do not oppose this motion. A redacted version of the hearing transcript is attached as Exhibit A.

November 16, 2019

/s/ Melissa R. Smith

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*Attorneys for Defendant Apple Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 16, 2019.

*/s/ Melissa R. Smith*

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Melissa R. Smith