

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

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

**MAXELL, LTD.'S UNOPPOSED MOTION FOR LEAVE TO EXCEED
PAGE LIMIT FOR ATTACHMENTS TO ITS OPPOSITION TO APPLE INC.'S
MOTION TO COMPEL INFRINGEMENT CONTENTIONS COMPLIANT
WITH PATENT RULE 3-1(G) OR, IN THE ALTERNATIVE,
TO PRECLUDE MAXELL'S RELIANCE ON SOURCE CODE FOR INFRINGEMENT**

Maxell seeks leave to exceed the page limitation for attachments contained in the Court's June 3, 2016 Standing Order Regarding "Meet and Confer" Obligations Relating to Discovery Disputes. Given Apple's characterizations and accusations of Maxell's contentions, Maxell seeks leave to provide a full set of its Supplemental Infringement Contentions for the Court's *in camera* review.

Apple does not oppose this relief.

Respectfully submitted,

Dated: November 27, 2019

By: /s/ Geoff Culbertson

Geoff 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
Saqib J. Siddiqui
Bryan C. Nese
William J. Barrow
Alison T. Gelsleichter
Clark S. Bakewell
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
ssiddiqui@mayerbrown.com
bnese@mayerbrown.com
wbarrow@mayerbrown.com
agelsleichter@mayerbrown.com
cbakewell@mayerbrown.com

Robert G. Pluta
Amanda Streff 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.

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 27th day of November, 2019, with a copy of this document via the Court's electronic CM/ECF system.

/s/ Geoff Culbertson _____
Geoff Culbertson