

**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

**MAXELL, LTD. AND APPLE INC.’S JOINT MOTION TO REDACT THE COURT’S
JANUARY 3, 2020 ORDER (DKT. 171)**

Pursuant to the Court’s January 6, 2020 Order (Dkt. 172), Plaintiff Maxell, Ltd. and Defendant Apple Inc. hereby respectfully submit the proposed redactions to the Court’s January 3, 2020 Sealed Order (Dkt. 171) as outlined below:

Page(s)	Description of portions to be filed under seal
Pages 2-3, para. 6	Confidential business information regarding Maxell’s subsidiary’s work performed pursuant to Non-Disclosure Agreement.
Pages 3-4, para.10	Confidential business information regarding contract terms.
Page 4, para. 11	Confidential business information regarding licensing communications.
Page 4, para. 12	Confidential business information regarding contract terms.
Page 4, fn. 5	Confidential business information regarding contract terms.
Page 6, para. 16	Confidential business information regarding contract terms.
Page 7, para. 17	Confidential business information regarding contract terms.
Page 7, para. 18	Confidential business information regarding contract terms.
Page 7, para. 19	Confidential business information regarding contract terms.

Page 8, para. 20	Confidential business information regarding contract terms.
Page 8, para. 21	Confidential business information regarding contract terms.
Page 8, para. 22	Confidential business information regarding contract terms.
Pages 8-9, para. 23	Confidential business information regarding contract terms.
Page 9, para. 24	Confidential business information regarding contract terms and licensing negotiations.
Page 9, para. 25	Confidential business information regarding licensing negotiations.
Pages 9-10, para. 26	Confidential business information regarding contract terms.
Page 10, para. 27	Confidential business information regarding contract terms.
Page 15, para. 45	Confidential business information regarding subsidiary's work performed pursuant to Non-Disclosure Agreement.

A redacted version of the Order is attached as Exhibit A.

Dated: January 15, 2020

/s/ Jamie B. Beaber

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

/s/ Melissa R. Smith

Luann L. Simmons (*Pro Hac Vice*)

lsimmons@omm.com

O'MELVENY & MYERS LLP

Two Embarcadero Center

28th Floor

San Francisco, CA 94111

Telephone: 415-984-8700

Facsimile: 415-984-8701

Xin-Yi Zhou (*Pro Hac Vice*)

vzhou@omm.com

Anthony G. Beasley (TX #24093882)

tbeasley@omm.com

Kfir B. Levy
James A. Fussell, III
Baldine B. Paul
Tiffany A. Miller
Saqib Siddiqui
Bryan Nese
William J. Barrow
Alison T. Gelsleichter
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
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.

O'MELVENY & MYERS LLP

400 S. Hope Street
Los Angeles, CA 90071
Telephone: 213-430-6000
Facsimile: 213-430-6407

Laura Bayne Gore (*Pro Hac Vice*)
lbayne@omm.com

O'MELVENY & MYERS LLP

Times Square Tower, 7 Times Square
New York, NY 10036
Telephone: 212-326-2000
Facsimile: 212-326-2061

Melissa R. Smith (TX #24001351)
melissa@gilliamsmithlaw.com

GILLIAM & SMITH, LLP

303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

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 January 15, 2020.

/s/ Melissa R. Smith
Melissa R. Smith