

**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-0036-RWS

**JURY TRIAL DEMANDED**

**JOINT REPORT REGARDING  
APPLE'S MOTION FOR PROTECTIVE ORDER (D.I. 228, 242, 291)**

On March 12, 2020, Apple filed a motion for protective order concerning certain of Maxell's Rule 30(b)(6) topics. D.I. 228. Maxell filed its opposition on March 26. D.I. 242. Pursuant to this Court's Order (D.I. 279), Apple filed its reply on April 22 (D.I. 291) and the parties met and conferred on April 27. The parties thereafter continued to confer by email. The results of the parties' discussions are summarized below, organized consistent with the motion:

- Section A: Topic 1 - **unresolved**, Topic 3 - **resolved**, Topic 8 - **resolved**
- Section B: Topic 4 - **unresolved**, Topic 7 - **resolved**, Topic 29 - **unresolved with respect to Intel/Qualcomm/Dialog/Sony, otherwise resolved**, and Topic 58 - **resolved**
- Section C: Topics 38 and 41: **unresolved**
- Section D: Topics 39 and 56: **unresolved**
- Section E: Topic 63: **unresolved**
- Section F: Topics 78 - **resolved**, Topic 79 - **resolved**, and Topic 80 - **unresolved**

Dated: April 30, 2020

By: /s/ Jamie B. Beaver

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**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 April 30, 2020.

/s/ Melissa R. Smith