

**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 MOTION SEEKING ENTRY OF PROTECTIVE ORDER

Plaintiff Maxell, Ltd. (“Maxell”) and Defendant Apple Inc. (“Apple”) (collectively, “the Parties”) hereby submit this Joint Motion Seeking Entry of Protective Order.

The Parties have conferred yet failed to agree to several terms of the proposed Protective Order. These terms, and the Parties’ respective proposals, are designated in highlighting in the attached.

Dated: June 17, 2019

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 17th day of June, 2019, with a copy of this document via the Court's CM/ECF system.

/s/ Melissa R. Smith _____