

**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 SUBMISSION REGARDING D.I. 497**

Pursuant to D.I. 498, Apple and Maxell jointly submit the attached Exhibit A as a proposed publicly-available redacted version of the Order denying Maxell, Ltd.'s Opposed Motion for Sanctions.

Dated: August 25, 2020

By: /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  
Kfir B. Levy  
James A. Fussell, III  
Baldine B. Paul  
Tiffany A. Miller  
Saqib Siddiqui  
Bryan 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 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.*

/s/ Luann L. Simmons

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  
**O'MELVENY & MYERS LLP**  
400 S. Hope Street  
Los Angeles, CA 90071  
Telephone: 213-430-6000  
Facsimile: 213-430-6407

Marc J. Pensabene (*Pro Hac Vice*)  
mpensabene@omm.com  
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 August 25, 2020.

/s/ *Melissa R. Smith*