

**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

JOINT MOTION TO SEAL AND FILE REDACTED ORDER

Plaintiff Maxell, Ltd. and Defendant Apple Inc. respectfully submit this joint motion to seal Dkt. No. 510 and to file the redacted order attached hereto as Exhibit A. It has come to the parties' attention that the order at Dkt. No. 510 was not completely redacted by counsel. As such, the parties seek to seal Dkt. No. 510 and submit the attached version, which has been properly redacted.

Dated: September 1, 2020

By: /s/ Geoff Culbertson (w/permission)

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

By: /s/ Melissa R. Smith

Melissa R. Smith (TX #24001351)
melissa@gilliamsmithlaw.com
Gilliam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
Tel: 903.934.8450
Fax: 903.934.9257

Mark D. Fowler (*Pro Hac Vice*)
Brent K. Yamashita
Christian Chessman
DLA PIPER LLP (US)
2000 University Ave.
East Palo Alto, CA 94303-2214
Tel: 650.833.2000

James A. Fussell, III
William J. Barrow
Baldine B. Paul
Tiffany A. Miller
Michael L. Lindinger
Saqib Siddiqui
Bryan C. Nese
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
jfussel@mayerbrown.com
wbarrow@mayerbrown.com
bpaul@mayerbrown.com
tmiller@mayerbrown.com
mlindinger@mayerbrown.com
ssidiqui@mayerbrown.com
bnese@mayerbrown.com
agelsleichter@mayerbrown.com
cbakewell@mayerbrown.com

Robert G. Pluta
Amanda Streff Bonner
Luiz Miranda
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
(312) 782-0600
rpluta@mayerbrown.com
asbonner@mayerbrown.com
lmiranda@mayerbrown.com

Counsel for Plaintiff Maxell, Ltd.

Fax: 650.833.2001

Sean C. Cunningham (*Pro Hac Vice*)
Erin P. Gibson (*Pro Hac Vice*)
Kevin Hamilton (*Pro Hac Vice*)
David R. Knudson (*Pro Hac Vice*)
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101
Tel: 619.699.2700
Fax: 619.699.2701

Michael Jay (*Pro Hac Vice*)
DLA PIPER LLP (US)
2000 Avenue of the Stars, Suite 400
Los Angeles, CA 90067
Tel: 310.595.3000
Fax: 310.595.3300

Aaron G. Fountain
Zachary Loney
DLA PIPER LLP (US)
401 Congress Avenue, Suite 2500
Austin, Texas 78701-3799
Tel: 512.457.7000
Fax: 512.457.7001

Dawn M. Jenkins
DLA PIPER LLP (US)
1000 Louisiana, Suite 2800
Houston, TX 77002-5005
Tel: 713.425.8490
Fax: 713.300.6012

Paul Steadman (*Pro Hac Vice*)
Stephanie Lim (*Pro Hac Vice*)
DLA PIPER LLP (US)
444 West Lake Street, Ste. 900
Chicago, IL 60606
Tel: 312.368.4000
Fax: 312.236.7516

Luann L. Simmons (*Pro Hac Vice*)
lsimmons@omm.com
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, CA 94111
Tel: 415.984.8700
Fax: 415.984.8701

Counsel 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 September 1, 2020.

/s/ Melissa R. Smith
Melissa R. Smith