

**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**

**NOTICE OF READINESS FOR HEARING  
ON PLAINTIFF MAXELL, LTD.'S MOTION TO COMPEL**

Maxell, Ltd. ("Maxell") files this notice that its Opposed Motion to Compel Defendant Apple Inc. ("Apple") To Produce Timely Discovery (D.I. 56) is fully briefed and ripe for consideration. The parties will be before the Court on August 28, 2019 for a hearing on Apple's Motion to Dismiss In Part. Should the Court also wish to hear arguments on Maxell's Motion to Compel at the August 28, 2019 hearing, there is sufficient time for the parties to complete the process set forth in this Court's Standing Order Regarding Meet and Confer Obligations Relating to Discovery Disputes.

Dated: August 20, 2019

By: /s/ Geoff Culbertson

Geoffrey P. 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](mailto:gpc@texarkanalaw.com)

[kbt@texarkanalaw.com](mailto:kbt@texarkanalaw.com)

Jamie B. Beaber  
Alan M. Grimaldi  
Kfir B. Levy  
James A. Fussell, III  
Baldine B. Paul  
Tiffany A. Miller  
Saqib J. Siddiqui  
Bryan C. Nese  
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  
agelsleichter@mayerbrown.com

Robert G. Pluta  
Amanda Streff 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.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 20<sup>th</sup> day of August, 2019, with a copy of this document via the Court's electronic CM/ECF system.

Dated: August 20, 2019

/s/ Geoff Culbertson  
Geoffrey P. Culbertson