

PUBLIC VERSION

**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

JURY TRIAL DEMANDED

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JOINT PRETRIAL OBJECTIONS

Pursuant to the Court's Amended Docket Control Order (Dkt. No. 623), Plaintiff Maxell, Ltd. ("Plaintiff" or "Maxell") and Defendant Apple Inc. ("Apple") hereby submit their pretrial objections.

Attached at Exhibit A is a listing of Maxell's objections to Apple's proposed trial exhibits. Attached at Exhibit B is a listing of Maxell's objections to Apple's deposition designations. Attached at Exhibit C is a listing of Apple's objections to Maxell's proposed trial exhibits. Attached at Exhibit D is a listing of Apple's objections to Maxell's deposition designations.

The parties met and conferred regarding pretrial objections on February 25, 2021. At that meeting, the parties agreed there were certain categories of exhibit objections that would benefit from being addressed at the Pretrial Conference scheduled for March 10, 2021, and that it would be more efficient to address other objections during trial once it is more clear which exhibits will be used and through whom they will be introduced. The parties also agreed that it would be more efficient to address objections to deposition designations during trial insofar as each party acknowledged that they are unlikely to seek the introduction into evidence of significant portions of the current designations.

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With respect to the categorical exhibit objections to be addressed at the Pretrial Conference, the parties are currently continuing their meet and confer on the issue and will notify the Court of the specific exhibits and objections they expect to present to the Court at the Pretrial Conference.

In view of the foregoing, the parties reserve the right to withdraw or amend these objections based on continuing meet and confers between the parties.

Dated: March 1, 2021

/s/ Jamie B. Beaber

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Dated: March 1, 2021

Respectfully Submitted

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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 1st day of March, 2021, with a copy of this document via electronic mail pursuant to Local Rule CV-5(d).

/s/ Jamie B. Beaber

Jamie B. Beaber

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