

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

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 J. Siddiqui
Bryan C. Nese
William J. Barrow
Alison T. Gelslechter
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

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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 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.

Dated: March 1, 2021

Respectfully Submitted

By: /s/ Mark D. Fowler
Melissa Richards Smith
Texas Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

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
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)

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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
Telephone: 415-984-8700
Facsimile: 415-984-8701

COUNSEL FOR DEFENDANT APPLE INC.

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

[REDACTED]