

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

Civil Action No. 5:19-cv-00036-RWS

[REDACTED]

[REDACTED]

JURY TRIAL DEMANDED

**APPLE INC.'S REPLY IN SUPPORT OF AMENDED MOTION TO TRANSFER
VENUE PURSUANT TO 28 U.S.C. § 1404(a)**



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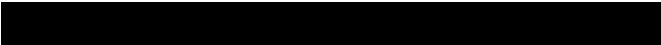


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[REDACTED]

I. INTRODUCTION

[REDACTED]

Transfer is additionally warranted because, as this Court has found in other cases involving Apple, the relevant private and public interest factors favor transfer. Maxell tries to manufacture ties to this District through its retained outside counsel—an argument that courts have repeatedly rejected. Maxell also points broadly to Apple vendors and suppliers in Texas who have no material evidence relevant to this case. The fact that Apple and some of its vendors may have employees in Texas is irrelevant—the pertinent question is whether there are likely relevant witnesses and sources of proof in the EDTX. Other than its counsel, Maxell fails to allege there is any relevant witness or evidence located in the EDTX. And Maxell does not dispute that the NDCA would be more convenient for the inventors of the patents-in-suit. Because venue is clearly more convenient in the NDCA, Apple respectfully requests that this Court transfer the case.

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