

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

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

v.

LG ELECTRONICS, INC., ET AL.,

Defendants.

CIVIL ACTION NO. 6:14-cv-982

CONSOLIDATED LEAD CASE

MOTION FOR ISSUANCE OF LETTER ROGATORY

Plaintiff Cellular Communications Equipment LLC hereby moves, pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970 and 28 U.S.C § 1781 for issuance of a Request for International Judicial Assistance directed to the Ministry of Justice, Finland requesting the production of relevant documents by third-party Nokia Corporation. Plaintiff submits that the requested documents are necessary and in the interest of justice, that Nokia Corporation is not subject to service of a subpoena within the United States, and that it is not possible to obtain the requested documents in an admissible form in any other manner.

For these reasons, Plaintiff respectfully requests that this Court grant this motion and issue the proposed Request for International Judicial Assistance attached hereto as Exhibit A, bearing an original signature by the court and original seal affixed by the clerk of the court. Plaintiff makes these specific requests to comply with the requirements for service in Finland.

Dated: October 19, 2015

Respectfully submitted,

/s/ Edward R. Nelson, III

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2015, I electronically filed the foregoing document with the clerk of the Court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the Court's electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Edward R. Nelson, III
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