

Exhibit “A”

**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

**Request for International Judicial Assistance Pursuant to the Hague Convention
of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

Sender:

Ed Nelson
NELSON BUMGARDNER
3131 W. 7th Street
Suite 300
Fort Worth, Texas 76107
Direct: 817-377-3489
ed@nelbum.com

Central Authority of the Requested State:

Maija Leppä
PL 25
00023 VALTIONEUVOSTO
Telephone: +358 9 1606 7628
Fax: +358 9 1606 7524
Central.authority@om.fi

Person to whom the executed request is to be returned:

Ed Nelson
NELSON BUMGARDNER
3131 W. 7th Street
Suite 300
Fort Worth, Texas 76107

Direct: 817-377-3489
ed@nelbum.com

Date by which the requesting authority requires receipt of the response to the Letter of Request:

The requesting authority, the District Court for the Eastern District of Texas, Tyler Division, requests that the receipt of the response to this Request be returned within the standard timeframe that the Finnish Ministry of Justice has used to process such previous requests. This request is not made as an urgent request, but rather one to be handled within standard operating procedures.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

Requesting Judicial Authority:

United States District Court for the Eastern District of Texas, Tyler Division
William M. Steger Federal Building and United States Courthouse
211 West Ferguson Street
Room 106
Tyler, Texas 75702
Phone: (903) 590-1000
Fax: (903) 590-1015

The above-mentioned Authority is making this Request to:

Ministry of Justice, Finland
PL 25
00023
VALTIONEUVOSTO
Finland
Central.authority@om.fi

This Request is made under the following judicial proceeding:

Cellular Communications Equipment LLC, *plaintiff*, v. LG Electronics, Inc., et al., *Defendants*,
Civil Action File Number 6:14-cv-982

This Request is to be served upon:

Nokia Corporation
Karaportti 3
FI-02610 Espoo
Finland

The nature of the case from which this Request stems is a complaint on patent infringement of U.S. Patent No. 8,385,966. It alleges that certain defendants have and continue to infringe by selling, importing, making, using, offering for sale, among other things, certain mobile devices manufactured by Samsung. The same allegations are further alleged, but involve U.S. Patent Nos. 8,848,556; and 8,868,060. To this point in the litigation, the defendants have not filed an answer and counterclaim. However, the defendants have filed a motion to dismiss based on the alleged failure to plead indirect infringement with sufficient specificity. The Plaintiff opposed the motion, but the judge has not ruled on the motion as of the date of this Request.

The nature of the proceedings being requested in this letter is Request for Productions to Nokia for certain documents kept and maintained through their course of business. This evidence is sought for the intended use at trial between Plaintiff and Defendants.

The evidence to be collected is as follows:

1. All licenses between Nokia (or its Affiliate(s)) and Alcatel-Lucent S.A. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
2. All licenses between Nokia (or its Affiliate(s)) and Amazon (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
3. All licenses between Nokia (or its Affiliate(s)) and Apple Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
4. All licenses between Nokia (or its Affiliate(s)) and Dell Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
5. All licenses between Nokia (or its Affiliate(s)) and LM Ericsson Telephone Company (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
6. All licenses between Nokia (or its Affiliate(s)) and Handspring, Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
7. All licenses between Nokia (or its Affiliate(s)) and HTC Corporation (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
8. All licenses between Nokia (or its Affiliate(s)) and Huawei Technologies Co. Ltd. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
9. All licenses between Nokia (or its Affiliate(s)) and Kyocera Corporation (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
10. All licenses between Nokia (or its Affiliate(s)) and LG Electronics, Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
11. All licenses between Nokia (or its Affiliate(s)) and Lenovo Group Ltd. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
12. All licenses between Nokia (or its Affiliate(s)) and Microsoft Corporation. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)

13. All licenses between Nokia (or its Affiliate(s)) and Mitsubishi Group (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
14. All licenses between Nokia (or its Affiliate(s)) and Motorola, Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
15. All licenses between Nokia (or its Affiliate(s)) and NEC and/or NEC Casio and/or NEC Casio Mobile Communications, Ltd. and/or NEC Corporation of America. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
16. All licenses between Nokia (or its Affiliate(s)) and Option Wireless and/or Option NV (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
17. All licenses between Nokia (or its Affiliate(s)) and Pantech Co., LTD. and/or Pantech Wireless, Inc. (or its Affiliate(s)) regarding the Patents-in-Suit.
18. All licenses between Nokia (or its Affiliate(s)) and Koninklijke Philips N.V. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
19. All licenses between Nokia (or its Affiliate(s)) and Qualcomm Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
20. All licenses between Nokia (or its Affiliate(s)) and Research-in-Motion Limited and/or Research-in-Motion Corporation and/or Blackberry Limited and/or Blackberry Corporation (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
21. All licenses between Nokia (or its Affiliate(s)) and Samsung Group (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
22. All licenses between Nokia (or its Affiliate(s)) and Siemens AG (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
23. All licenses between Nokia (or its Affiliate(s)) and Sierra Wireless (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
24. All licenses between Nokia (or its Affiliate(s)) and ZTE Corporation and/or ZTE (USA) Inc. (or its Affiliate(s)) regarding the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
25. Documents sufficient to show any license between Nokia (or its Affiliate(s)) and any other entity not included in Requests for Production Nos. 1-24 regarding any of the Patents-in-Suit. (U.S. Patent Nos. 8,385,966; 8,848,556; and 8,868,060)
26. A complete and unredacted copy of the Contribution Agreement between Siemens Networks GmbH & Co. KG and Siemens Aktiengesellschaft dated September 28, 2006.
27. A complete and unredacted copy of the Contribution Agreement between Nokia and Siemens Networks GmbH & Co. KG and D Zqei GmbH & Co. KG dated December 28, 2007.
28. Completed and unredacted copies of any schedules and/or Annexes referenced in the Contribution Agreement between Siemens Networks GmbH & Co. KG and Siemens Aktiengesellschaft dated September 28, 2006.
29. A complete and unredacted copy of the Framework Agreement between Nokia Corporation and Siemens Aktiengesellschaft dated June 19, 2006 and referenced in the Contribution Agreement between Siemens Networks GmbH & Co. KG and Siemens Aktiengesellschaft dated September 28, 2006.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.