

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

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**
Plaintiff,

v.

HTC Corporation, et al.,
Defendants.

Civil Action No. 6:13-cv-507-JRG-KNM

CONSOLIDATE LEAD CASE

JURY TRIAL DEMANDED

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**
Plaintiff,

v.

LG ELECTRONICS, INC., et al.,
Defendants.

Civil Action No. 6:14-cv-982-JRG-KNM

JURY TRIAL DEMANDED

JOINT MOTION TO CONSOLIDATE CASES

Plaintiff Cellular Communications Equipment, LLC (“CCE”) and Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc. (collectively, “LGE”) hereby move for the consolidation of *Cellular Communications Equipment LLC v. LG Electronics, Inc., et al.*, No. 6:13-cv-508 (“the 508 action”) with *Cellular Communications Equipment LLC v. LG Electronics, Inc., et al.*, No. 6:14-cv-982 (“the 982 action”). The consolidated case would then proceed in accordance with the procedural and trial schedules set for the 982 action.

At present, the 508 action is a constituent case in consolidated Civil Action No. 6:13-cv-507. Because the 508 and 982 actions share a common plaintiff and common defendants, it is believed that consolidation of the two actions will preserve the resources of the parties as well as the Court. Accordingly, CCE and LGE ask that the Court grant the requested consolidation.

Defendants AT&T Inc., AT&T Mobility LLC, Cellco Partnership d/b/a Verizon Wireless, Sprint Solutions, Inc., Sprint Spectrum L.P., Boost Mobile, LLC, T-Mobile USA, Inc., and T-Mobile US, Inc. do not oppose the requested consolidation so long as the two cases are consolidated as to all of the defendants.

Dated: November 3, 2015

Respectfully submitted,

<p><u>/s/ Jamie B. Beaber</u> Jamie B. Beaber (D.C. Bar No. 484186) Kfir B. Levy (D.C. Bar No. 989212) MAYER BROWN LLP 1999 K Street, N.W. Washington, DC 20006-1101 Telephone: (202) 263-3000 Facsimile: (202) 263-3300 jbeaber@mayerbrown.com klevy@mayerbrown.com</p> <p>Robert G. Pluta (IL Bar No. 6278255) MAYER BROWN LLP 71 S. Wacker Drive Chicago, IL 60606 Telephone: (312) 782-0600 Facsimile: (312) 701-7711 rpluta@mayerbrown.com</p> <p>Michael E. Jones State Bar No. 10929400 mikejones@potterminton.com Allen F. Gardner State Bar No. 24043679 allengardner@potterminton.com POTTER MINTON P.C. 110 N. College Avenue, Suite 500 Tyler, Texas 75702 Telephone: (903) 597-8311 Facsimile: (903) 593-0846</p> <p>ATTORNEYS FOR LG ELECTRONICS, INC. AND LG ELECTRONICS U.S.A., INC.</p>	<p><u>/s/ Edward R. Nelson III</u> Edward R. Nelson III ed@nelbum.com Texas State Bar No. 00797142 S. Brannon Latimer brannon@nelbum.com Texas State Bar No. 24060137 Thomas C. Cecil tom@nelbum.com Texas State Bar No. 24069489</p> <p>NELSON BUMGARDNER PC 3131 West 7th Street, Suite 300 Fort Worth, Texas 76107 Phone: (817) 377-9111 Fax: (817) 377-3485</p> <p>T. John Ward, Jr. Texas State Bar No. 00794818 J. Wesley Hill Texas State Bar No. 24032294 Claire Abernathy Henry Texas State Bar No. 24053063 Ward & Smith Law Firm P.O. Box 1231 1127 Judson Rd. Ste. 220 Longview, Texas 75606-1231 (903) 757-6400 (903) 757-2323 (fax) jw@jwfirm.com wh@wsfirm.com claire@wsfirm.com</p> <p>ATTORNEYS FOR CELLULAR COMMUNICATIONS EQUIPMENT LLC</p>
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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 3d day of November, 2015, with a copy of this document via electronic mail pursuant to Local Rule CV-5(d).

/s/ Jamie B. Beaber
Jamie B. Beaber

CERTIFICATE OF CONFERENCE

I certify that the parties have complied with the requirements of Local Rule CV-7(h). The parties have met and conferred and this motion is unopposed.

/s/ Jamie B. Beaber
Jamie B. Beaber

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ORDER

Having considered the joint motion to consolidate cases filed by Plaintiff Cellular Communications Equipment, LLC and Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc., the Court **GRANTS** the motion and **ORDERS** that Case No. 6:13-cv-508 is consolidated with Case No. 6:14-cv-982. Case No. 6:14-cv-982 shall serve as the lead case for future filings regarding Case No. 6:14-cv-982 and/or Case No. 6:13-cv-508.