

**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-JRG

**AT&T MOBILITY LLC'S MOTION FOR
ADOPTION AND ENTRY OF DISCOVERY ORDER**

In accordance with the Court's Order of June 15, 2015 (Dkt. 62), AT&T Mobility LLC ("AT&T") hereby submits its proposed Discovery Order, attached hereto as Exhibit A. AT&T's proposed Discovery Order is largely the same as the Discovery Order proposed by the other parties, but with some modifications to the expert depositions section 5(e). Attached hereto as Exhibit B is a redline comparison showing the differences between AT&T's proposed Discovery Order and the Discovery Order submitted by the other parties. While AT&T's proposal does not vary significantly from the proposal submitted by the other parties, AT&T submits that its proposal more adequately addresses the number of disparate patents in this case, and reflects the minimum sufficient amount of time for Defendants to depose Plaintiff's experts. In particular, AT&T proposes the following limits be established for Defendants to collectively depose Plaintiff's experts:

- Infringement Experts: 7 hours per asserted patent plus 3 hours per each additional Manufacturer Defendant beyond the first.
- Validity Experts: 5 hours per asserted patent.

- Damages and Other Experts: 5 hours per asserted patent plus 3 hours per each additional Manufacturer Defendant beyond the first.

Therefore, AT&T respectfully requests that the Court adopt its proposed Discovery Order.

Dated: June 19, 2015

Respectfully submitted,

/s/ Christopher W. Kennerly
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**ATTORNEYS FOR AT&T MOBILITY
LLC**

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I certify that between June 12 and 19, counsel for AT&T met and conferred with the parties. Counsel for Plaintiff indicated that they oppose the relief requested.

/s/ Christopher W. Kennerly
Christopher W. Kennerly

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on this 19th day of June, 2015. As of this date all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Christopher W. Kennerly
Christopher W. Kennerly