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

SIPCO, LLC, and IP CO, LLC (d/b/a INTUS IQ),

Plaintiffs,

v.

Civil Action No. 6:15-cv-907

EMERSON ELECTRIC CO., EMERSON PROCESS MANAGEMENT LLLP, FISHER-ROSEMOUNT SYSTEMS, INC., ROSEMOUNT INC., BP, p.l.c., BP AMERICA, INC., and BP AMERICA PRODUCTION COMPANY,

Defendants.

## AGREED MOTION FOR ENTRY OF E-DISCOVERY ORDER

Plaintiffs SIPCO, LLC and IP CO, LLC (d/b/a INTUS IQ), with agreement from

Emerson Electric Co., Emerson Process Management LLLP, Fisher-Rosemount Systems, Inc.,

Rosemount Inc., BP America, Inc., and BP America Production Company, respectfully submit

the attached proposed E-Discovery Order for the Court's signature.

Dated: March 14, 2016

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Respectfully Submitted,

/s/ Paul J. Cronin (by permission Claire A. Henry) Paul J. Cronin, Admitted July 16, 2012 LEAD ATTORNEY (MA Bar No. 641230) James C. Hall, Admitted April 9, 2012 (MA Bar No. 656019) NUTTER MCCLENNEN & FISH LLP 155 Seaport Boulevard Boston, Massachusetts 02210 Telephone: (617) 439-2000 Facsimile: (617) 310-9000 Email: pcronin@nutter.com Email: jhall@nutter.com T. John Ward, Jr. Texas State Bar No. 00794818 Email: jw@wsfirm.com Claire Abernathy Henry Texas State Bar No. 24053063 Email: claire@wsfirm.com WARD, SMITH & HILL, PLLC P.O. Box 1231 1127 Judson Road, Ste. 220 Longview, Texas 75606-1231 Telephone: (903) 757-6400 Facsimile: (903) 757-2323

## **ATTORNEYS FOR PLAINTIFFS**

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service with a true and correct copy of the foregoing by email on this the 14<sup>th</sup> day of March, 2016.

/s/ Claire Abernathy Henry