

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

RFCYBER CORP.,	§	Case No. 6:21-cv-00916-ADA
	§	
Plaintiff,	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
v.	§	
	§	
APPLE, INC.,	§	
	§	
Defendant.	§	
	§	

**PLAINTIFF RFCYBER CORP.'S NOTICE OF  
VENUE DISCOVERY**

Pursuant to the Court's June 8, 2021 Amended Standing Order Regarding Venue And Jurisdictional Discovery Limits For Patent Cases, Plaintiff RFCyber Corp. intends to conduct venue discovery regarding Defendant Apple, Inc.'s Opposed Motion for Intra-District Transfer to the Austin Division Pursuant to 28 U.S.C. §1404(a) (Dkt. 93).

Dated: August 29, 2022

Respectfully submitted,

/s/ Richard M. Cowell  
Raymond W. Mort, III  
Texas State Bar No. 00791308  
Email: raymort@austinlaw.com  
**THE MORT LAW FIRM, PLLC**  
100 Congress Avenue, Suite 2000  
Austin, Texas 78701  
Tel/Fax: 512-865-7950

*OF COUNSEL:*

Alfred R. Fabricant (*Pro Hac Vice* to be filed)  
NY Bar No. 2219392  
Email: ffabricant@fabricantllp.com  
Peter Lambrianakos (*Admitted Pro Hac Vice*)  
NY Bar No. 2894392  
Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III (*Pro Hac Vice* to be filed)

NY Bar No. 4557435

Email: [vrubino@fabricantllp.com](mailto:vrubino@fabricantllp.com)

Richard M. Cowell (Admitted *Pro Hac Vice*)

NY Bar No. 4617759

Email: [rcowell@fabricantllp.com](mailto:rcowell@fabricantllp.com)

Jacob Ostling (Admitted *Pro Hac Vice*)

NY Bar No. 5684824

Email: [jostling@fabricantllp.com](mailto:jostling@fabricantllp.com)

**FABRICANT LLP**

411 Theodore Fremd Avenue, Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

***ATTORNEYS FOR PLAINTIFF  
RFCYBER CORP.***

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing via electronic mail to all counsel of record.

/s/ Richard M. Cowell  
Richard M. Cowell