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9
10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 VIASAT, INC.,

13 Plaintiff,

14 vs.

15 SPACE SYSTEMS/LORAL, INC.,
16 LORAL SPACE &
COMMUNICATIONS,
INC.,

17 Defendants.

CASE NO. 3:12-cv-00260-H-WVG

**UNOPPOSED MOTION TO
ALLOW PLAINTIFF VIASAT, INC.
TO FILE AN OMNIBUS
OPPOSITION TO DEFENDANT
SPACE SYSTEMS/LORAL, INC.'S
MOTIONS FOR JUDGMENT AS A
MATTER OF LAW OR A NEW
TRIAL RELATING TO DAMAGES
(NOS. 1-4 OF 12)**

Post-Trial Motion Hearing: August 7,
2014

Dept: 13

Hon. Marilyn L. Huff

1 On June 13, 2014, Defendant Space Systems/Loral, Inc. (“SS/L”) filed twelve
2 motions for judgment as a matter of law, four of which relate to damages issues.
3 (Dkt. 1036, 1040, 1042, and 1046.) After review, it appears to Plaintiff ViaSat, Inc.
4 (“ViaSat”) that SS/L’s damages-related motions raise several common issues.
5 ViaSat therefore seeks leave to respond to SS/L’s damages-related motions for
6 judgment as a matter of law in a single omnibus opposition brief. SS/L does not
7 oppose this request, although it contends that its motions are separate and that it
8 should be permitted to reply with separate briefs in support of each motion.

9 ViaSat’s proposed omnibus brief would not exceed the 100 pages ViaSat
10 would otherwise be allotted if it filed separate opposition briefs to each of SS/L’s
11 damages-related motions. ViaSat’s omnibus brief may (and, indeed, likely will) be
12 shorter, however, due to the efficiencies gained by addressing issues common to
13 multiple motions in a single opposition.

14 Counsel for ViaSat and counsel for SS/L have conferred regarding this issue.
15 SS/L does not oppose ViaSat’s request for leave to file an omnibus opposition to
16 SS/L’s damages-related motions for judgment as a matter of law. Nor does SS/L
17 oppose the page limit for this brief. SS/L reserves the right, however, to file
18 separate reply briefs addressing each of its motions.

19 ViaSat believes that these facts establish good cause for its proposal and
20 therefore respectfully requests that the Court enter an order as follows:

- 21 1. ViaSat shall be permitted to file a single opposition brief of 100 pages
22 or less addressing SS/L’s damages-related motions for judgment as a
23 matter of law (Dkt. 1036, 1040, 1042, and 1046); and
24

2. SS/L shall retain the right to file separate reply briefs addressing each of its damages-related motions for judgment as a matter of law.

DATED: June 20, 2014

By: /s/ Adam B. Wolfson

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Attorneys for Plaintiff ViaSat, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on June 20, 2014, I caused the foregoing **UNOPPOSED MOTION TO ALLOW PLAINTIFF VIASAT, INC. TO FILE AN OMNIBUS OPPOSITION TO DEFENDANT SPACE SYSTEMS/LORAL, INC.'S MOTIONS FOR JUDGMENT AS A MATTER OF LAW OR A NEW TRIAL RELATING TO DAMAGES (NOS. 1-4 OF 12)** to be served on Defendants' counsel via the Court's ECF system and via e-mail.

DATED: June 20, 2014

By /s/ Adam B. Wolfson
Adam B. Wolfson