FILED
OCT 20 2015
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

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AT&T MOBILITY LLC

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

CELLULAR COMMUNICATIONS EQUIPMENT LLC,

Plaintiff,

vs.

HTC CORPORATION, et al.,

Defendants.

CASE NO. 15CV2373 BEN MDD

PENDING IN UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS

CASE NO. 6:13-CV-00507-KNM (CONSOLIDATED LEAD CASE)

AT&T MOBILITY LLC'S NOTICE OF MOTION AND MOTION TO COMPEL ACACIA RESEARCH CORPORATION TO PRODUCE PATENT LICENSE AGREEMENTS AND RELATED DOCUMENTS

Date:
Time:
Dept.:

FILED UNDER SEAL

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

COPY

PLEASE TAKE NOTICE that as soon as the matter can be heard in this court, Defendant AT&T Mobility LLC ("AT&T") will move the Court to compel production of documents by third party Acacia Research Corporation.

Pursuant to Fed. R. Civ. P. 45, AT&T hereby respectfully moves for an order compelling Acacia Research Corporation to produce the following documents in response to AT&T's subpoena:

- All licenses to the Asserted Patents involving Nokia Corp., Siemens and/or NSN;
- Complete and unredacted copies of the redacted agreements relating to NSN, Nokia Corp., and Siemens;
- [redacted]
- All agreements between one or more of the Inventors and one or more of Acacia, CCE, Nokia Corp., Siemens, and/or NSN related to User Equipment or any of the Patents-in-Suit, any Related Patent, or any Related Application;
- All license or settlement agreements relating to the Asserted Patents or similar technology;
- All portfolio licenses that include the Asserted Patents, and those that do not include one or more Asserted Patents; and
- Documents memorializing negotiations of licenses.

This motion is supported by this notice and motion, the memorandum of points and authorities, declaration of Jeffrey D. Comeau and exhibits submitted concurrently herewith.

DATED: October 20, 2015

Respectfully submitted,

PAUL HASTINGS LLP

By: /s/ Jeffrey D. Comeau

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