UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CASIO INC. Plaintiff, v. PAPST LICENSING GMBH & CO. KG, Defendant.	Civil Action No. 1:06 CV 01751 Judge: Gladys Kessler Magistrate Judge: Deborah Robinson
PAPST LICENSING GMBH & CO. KG, Counter-Plaintiff v. CASIO INC. and CASIO COMPUTER CO., LTD. Counter-Defendants	

PAPST'S MOTION FOR EXPEDITED CONSIDERATION OF ITS MOTION TO STAY PROCEEDINGS AND OF ITS MOTION TO CONTINUE THE JULY 23, 2007 DISCOVERY MOTION HEARING BEFORE MAGISTRATE JUDGE ROBINSON

Papst Licensing GmbH & Co. KG ("Papst") respectfully seeks expedited consideration of two motions that it is filing concurrently with this motion for expedited consideration.

One of the motions is a motion requesting Judge Kessler to stay all proceedings in this action pending a determination by the Judicial Panel on Multidistrict Litigation ("MDL Panel") whether to consolidate this case with five other cases for pre-trial purposes. That motion for a stay also requests a status conference, preferably on July 23, 2007, to resolve the case management issues raised by the motion.

The second motion requests Magistrate Judge Robinson to continue a hearing on two discovery motions that is scheduled for July 23, 2007, to allow Judge Kessler to rule first on the

motion for a stay of all proceedings and, in the event that the motion for a stay were denied, to allow all six pending discovery motions to be considered at the same hearing because the motions are all intertwined.

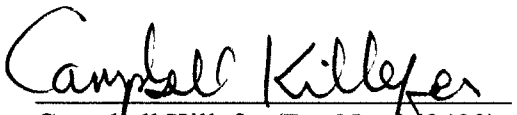
There is a need for expedited consideration of the motion for a stay and of the motion to continue the hearing of the discovery motions, so the Court and the parties will know before July 23, 2007 (1) whether the hearing currently scheduled for that day for two of the six pending discovery motions will be continued, and (2) whether Judge Kessler will conduct a status conference to resolve the case management issues that have been raised.

In accordance with Local Rule 7(m), counsel for Papst conferred with opposing counsel concerning this motion on July 13, 2007. No agreement was reached.

For the foregoing reasons, Papst requests that the Court grant this motion for expedited consideration of its motion for a stay of all proceedings and of its motion to continue a hearing on two discovery motions and requests a ruling before July 23, 2007.

Date: July 13, 2007

Respectfully submitted,



Campbell Killefer (Bar No. 468433)
VENABLE LLP
575 7th Street, N.W.
Washington, D.C. 20004
(202) 344-4000

Jerold B. Schnayer
Joseph E. Cwik
WELSH & KATZ, LTD.
120 South Riverside Plaza, 22nd Floor
Chicago, IL 60606
(312) 655-1500

Attorneys for Papst Licensing GmbH & Co. KG

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Papst's Motion for Expedited Consideration of Its Motion to Stay Proceedings and of Its Motion to Continue the July 23, 2007 Discovery Motion Hearing Before Magistrate Judge Robinson** was served upon the following counsel for Plaintiff and Counterclaim Defendant Casio Inc. and Counterclaim Defendant Casio Computer Co., Ltd. through the Court's ECF electronic service and by regular U.S. mail, postage prepaid, this 13th day of July 2007:

J. Kevin Fee
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004

Jeffrey M. Gold
Laura Krawczyk
MORGAN LEWIS & BOCKIUS LLP
101 Park Avenue
New York, New York 10178

Scott D. Stimpson
The Law Office of Scott Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, NY 10601
Counsel for Casio Inc.

Campbell Killefer