BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

In re Papst Licensing Digital Camera Patent Litigation	))	MDL - _____

CA 06-1751

MOTION FOR TRANSFER OF ACTION TO SINGLE DISTRICT FOR CONSOLIDATED AND COORDINATED PRE-TRIAL PROCEEDINGS

1. ***Relief Sought.*** Papst Licensing GmbH & Co. KG ("Papst") seeks to have all of the following actions transferred for consolidated and coordinated pre-trial proceedings as permitted by Section 1407(a) of Title 28 of the United States Code. Papst respectfully requests Oral Argument on this motion.

2. ***Schedule of Cases Requested to Be Transferred:***

District of Columbia
Casio, Inc. v. Papst Licensing GmbH & Co. KG, Case Action No. 1:06cv1751, Judge Kessler.

District of Columbia
Fujifilm Corporation, Fujifilm U.S.A., Inc. v. Papst Licensing GmbH & Co. KG; Case No. 1:07cv01118, Judge Kessler.

Northern District of Illinois
Papst Licensing GmbH & Co. KG v. Fujifilm Corporation, Fujifilm U.S.A., Inc., Case No. 07cv3401, Judge Holderman.

Central District of California, Western Division
Papst Licensing GmbH & Co. KG v. Samsung Techwin Co., Samsung Opto-Electronics American, Inc.; Civil Action No. 07cv4249, Judge Anderson Assigned.

District of Delaware
Papst Licensing GmbH & Co. KG v. Olympus Corporation, Olympus Imaging America, Inc., Civil Action No. 07cv0415, Vacant Judgeship.

3. ***Existence of Multiple Litigation.*** As more fully set forth in the supporting memorandum filed concurrently with this motion, five separate actions have been filed concerning the infringement of two United States patents owned by Papst (the "Tasler Patents").

4. ***Common Issue of Fact.*** Each of the actions includes at least the following common issues of fact:

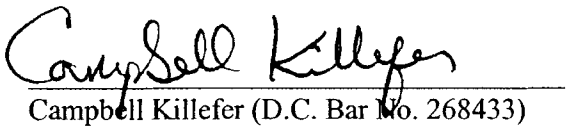
a. Whether digital cameras made, used, sold or offered for sale by Casio, Inc., Fujifilm Corporation, Fujifilm U.S.A., Inc., Olympus Corporation, Olympus Imaging America, Inc., Samsung Techwin Co., and Samsung Opto-Electronics America Inc., infringe or do not infringe the Tasler Patents; and

b. Whether the Tasler Patents are valid.

5. ***Benefits of Consolidation.*** As more fully set forth in the supporting memorandum, consolidation of these actions for pretrial discovery proceedings will serve the convenience of the parties and witnesses, and promote the just and efficient conduct and management of the actions. The questions of fact as to the infringement and validity of the Tasler Patents present numerous common issues of fact and law. Needless duplication or conflicting adjudication, or both, could result from continued independent maintenance of the separate actions.

July 9, 2007

Respectfully submitted,



Campbell Killefer (D.C. Bar No. 268433)
VENABLE LLP
575 7th Street, N.W.
Washington, D.C. 20004
(202) 344-4000 (phone)
(202) 344-8300 (fax)
ckillefer@venable.com (email)

Jerold B. Schnayer, Esq.
WELSH & KATZ, LTD.
120 S. Riverside Plaza, 22nd Floor
Chicago, Illinois 60606
(312) 655-1500 (phone)
(312) 655-1501 (fax)
jbsdocket@welshkatz.com (e-mail)

Attorneys for Papst Licensing GmbH & Co. KG

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of Motion For Transfer of Action to Single District For consolidation and Coordinated Pre-Trial Proceedings to be served via Overnight Courier, on the following parties pursuant to JPML Rule 5.2(a):

Counsel For Casio, Inc.
Jeffrey M. Gold
Morgan Lewis & Bockius
101 Park Avenue
New York, NY 10178

J. Kevin Fee
Morgan Lewis & Bockius
1111 Pennsylvania Avenue, NW.
Washington, DC 20004

Scott D. Stimpson
The Law Office of Scott D. Stimpson
445 Hamilton Avenue, 11th Floor
White Plains, NY 10601

Counsel For Fujifilm
Steven J. Routh
Sten A. Jensen
Hogan & Hartson LLP
555 Thirteenth Street, NW
Washington, DC 20004

William H. Wright
Robert J. Benson
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067

John R. Inge
Shinjuku Center Building
46th Floor
25-1 Nishi-Shinjuku 1-Chome
Shinjuku-ku Tokyo, 163-0646
Japan

Counsel For Olympus
Phillippe Y. Riesen
Hogan & Hartson
Gaikokuho Jimu Bengoshi Jimusho
Shinjuku Center Building, 46th Floor
25-1 Nishi-Shinjuku 1-chome, Shinjuku-ku
163-0646 Tokyo, Japan

Counsel For Samsung
Brian C. Rupp
Drinker Biddle
191 N. Wacker Drive
Suite 3700
Chicago, IL 60606

and on the following clerks of each district court in which an action is pending, pursuant JPML Rule 5.2(b):

Northern District of Illinois
Michael W. Dobbins
Clerk of Court
Everett McKinley Dirksen Building
219 South Dearborn Street
Chicago, Illinois 60604

District of Delaware
Peter T. Dalleo
Clerk of Court
U.S. District Court
844 N. King Street
Lockbox 18
Wilmington, DE 19801

District of Columbia
Nancy Mayer-Whittington
Clerk's Office
United States District Court
For the District of Columbia
333 Constitution Avenue, N.W.
Washington, D.C. 20001
(202) 354 - 3000

Central District of California
Sherri R. Carter
Clerk of Court
312 North Spring Street, Room G-8
Los Angeles, CA 90012

Done this 9th day of July, 2007.

Campbell Killefer