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: Robinson
PAPST LICENSING GMBH & CO. KG, Counter-Plaintiff v. CASIO INC. and CASIO COMPUTER CO., LTD. Counter-Defendants	Next Court Deadline: Written Discovery Requests by July 2, 2007

MOTION OF PAPST FOR ENTRY OF A PROTECTIVE ORDER

Defendant and Counter-Plaintiff, Papst Licensing GmbH & Co. KG ("Papst"), hereby moves this Court for an Order adopting Papst's proposed Protective Order. The parties agree that a Protective Order is required, yet Casio insists that Welsh & Katz, Ltd. (long time trial counsel for Papst) should be denied access to all Casio confidential information in this case. Casio is using this untenable position as a weapon to delay producing its confidential documents and information. Casio has failed to bring this issue to the attention of the Court, so Papst makes this motion in an effort to resolve this issue. The parties met and conferred on Protective Orders

issues on June 20, 2007. At that time, Casio indicated it would oppose any motion for entry of Papst's proposed Protective Order.

Date: June 26, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing 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 26th day of June, 2007:

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