

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**IN RE PAPST LICENSING GMBH & CO.
KG LITIGATION**

**This Document Relates To:

ALL CASES**

Misc. Action No. 07-493 (RMC)

MDL Docket No. 1880

CAMERA MANUFACTURERS' MOTION FOR CLARIFICATION

The Camera Manufacturers hereby move this Court for an Order relieving the parties of their obligation to appoint lead and liaison counsel for the March 12, 2008 filing and providing that they will be heard on the issue of lead and liaison counsel at the March 20, 2008 Status Conference.

In accordance with Local Rule 7(m), the Camera Manufacturers conferred with counsel for Papst by telephone on February 11, 2008 regarding whether Papst will seek appointment of lead and liaison counsel but have not received a definitive answer to date.

Respectfully Submitted,

DATED: February 27, 2008

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT
OF THE CAMERA MANUFACTURERS' MOTION FOR CLARIFICATION**

The Camera Manufacturers respectfully seek clarification of the portion of this Court's January 31, 2008 Order which calls for the parties to identify "lead and liaison counsel." Since the terms "lead counsel" and "liaison counsel" are used in different ways in different cases, the Camera Manufacturers request that the Court hear the parties at the upcoming March 20, 2008 Status Conference as to what role, if any, lead and liaison counsel should play in this case, and whether such appointments (if necessary at all) should be for the parties individually or for the group of Camera Manufacturers as a whole. At the present time, since the Camera Manufacturers have not yet been heard on the issue of whether there is a need for any lead or liaison counsel, they respectfully request that the Court relieve them of the obligation to appoint lead and liaison counsel for the March 12, 2008 filing.

To the extent the Court is contemplating appointing a single lead and/or liaison counsel to take substantive actions on behalf of all of the Camera Manufacturers, the Camera Manufacturers believe that such a lead or liaison counsel is unnecessary given the limited number of parties and counsel that are involved in this case and the fact that the Camera Manufacturers already are coordinating with each other successfully. For example, the Camera Manufacturers submitted a joint submission on the protective order and disqualification issues. The Camera Manufacturers are confident that they can and will continue to work cooperatively without the inconveniences and added expense attendant with the appointment of group lead and liaison counsel.

Accordingly, the Camera Manufacturers respectfully request that the Court relieve them of the duty to appoint lead and liaison counsel for the March 12, 2008 submission and hear the parties' views on this issue at the March 20, 2008 status conference.

On February 11, 2008, the Camera Manufacturers conferred with counsel for Papst regarding whether it will seek appointment of lead and liaison counsel but have not received a definitive answer to date.

Respectfully Submitted,

DATED: February 27, 2008

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**[PROPOSED] ORDER GRANTING THE CAMERA
MANUFACTURERS' MOTION FOR CLARIFICATION**

This matter came before the Court, with the Honorable Rosemary M. Collyer presiding, on the Camera Manufacturers' Motion for Clarification. Having considered the issues presented, the Camera Manufacturers' Motion is hereby granted, and

IT IS HEREBY ORDERED that

The Camera Manufacturers are relieved of their obligation to appoint lead and liaison counsel for the March 12, 2008 filing and that the parties will be heard on the issue of lead and liaison counsel at the March 20, 2008 Status Conference.

DATED: _____, 2008

Rosemary M. Collyer
United States District Judge