

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:10-cv-24063-MORENO

_____)
MOTOROLA MOBILITY, INC.,)
)
Plaintiff / Counterclaim Defendant,)
)
v.)
)
MICROSOFT CORPORATION,)
)
Defendant / Counterclaim Plaintiff.)
_____)

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Motorola Mobility, Inc. (“Motorola Mobility”) and Microsoft Corporation (“Microsoft”) (collectively “Parties”) jointly move the Court for entry of the stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials attached as Exhibit A.

1. This action involves claims by both Motorola Mobility and Microsoft for patent infringement.
2. The Parties agree that some of the documents, materials, and other information sought during the course of the discovery in this action will include confidential and proprietary information, including, but not limited to, confidential business information and confidential source code.
3. The Parties further agree that damage could result if the parties’ confidential and proprietary information is disclosed to any third party or otherwise made public.

4. To prevent any harm to the Parties from the disclosure to third parties of such confidential and proprietary information, the Parties have agreed to the terms of the Protective Order Regarding the Disclosure and Use of Discovery Materials attached as Exhibit A.

WHEREFORE, the Parties respectfully request that the Court enter the Protective Order Regarding the Disclosure and Use of Discovery Materials attached as Exhibit A. A proposed order granting this motion is attached as Exhibit B.

Dated: April 6, 2011

Dated: April 6, 2011

By: /s/ Edward M. Mullins

By: /s/ Roberto Martinez

Edward M. Mullins
Hal M. Lucas
Astigarraga Davis Mullins & Grossman, P.A.
701 Brickell Avenue, 16th Floor
Miami, FL 33131
Telephone: (305) 372-8282

Roberto Martinez, Esq.
Curtis Miner, Esq.
COLSON HICKS EIDSON
255 Alhambra Circle, Penthouse
Coral Gables, FL 33134
Telephone: (305) 476-7400

*Attorneys for Plaintiff /
Counterclaim Defendant*
MOTOROLA MOBILITY, INC.

*Attorneys for Defendant /
Counterclaim Plaintiff*
MICROSOFT CORPORATION

Jesse J. Jenner
Steven Pepe
Khue V. Hoang
Leslie M. Spencer
Ropes & Gray LLP
1211 Avenue of the Americas
New York, NY 10020
Telephone: (212) 596-9000

David T. Pritikin
Richard A. Cederth
Douglas I. Lewis
John W. McBride
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
Telephone: (312) 853-7000

Norman H. Beamer
Mark D. Rowland
Gabrielle E. Higgins
Ropes & Gray LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303
Telephone: (650) 617-4000

Brian R. Nester
Kevin C. Wheeler
SIDLEY AUSTIN LLP
1501 K Street NW
Washington, DC 20005
Telephone: (202) 736-8000

Kevin J. Post
Megan F. Raymond
Ropes & Gray LLP
One Metro Center
700 12th Street NW, Suite 900
Washington, DC 20005
Telephone: (202) 508-4600

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 6, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system. I also certify that the foregoing document is being served this date on all counsel of record or pro se parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or; in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward M. Mullins
Edward M. Mullins (Fla. Bar No. 863920)

SERVICE LIST

Motorola Mobility, Inc. v. Microsoft Corporation
Case No.: 1:10-CV-24063-MORENO/TORRES
United States District Court, Southern District of Florida

Edward M. Mullins
emullins@astidavis.com

Hal M. Lucas

hlucas@astidavis.com

Astigarraga Davis Mullins & Grossman, P.A.

701 Brickell Avenue, 16th Floor

Miami, Florida 33131

Telephone: (305) 372-8282

Facsimile: (305) 372-8202

Attorneys for Plaintiff Motorola Mobility, Inc.
Electronically served via CM/ECF

Of Counsel:

Leslie M. Spencer*

leslie.spencer@ropesgray.com

Steven Pepe*

steven.pepe@ropesgray.com

Jesse J. Jenner*

jesse.jenner@ropesgray.com

Ropes & Gray LLP

1211 Avenue of the Americas

New York, New York 10036

Telephone: (212) 596-9000

Facsimile: (212) 849-7100

Gabrielle E. Higgins*

gabrielle.higgins@ropesgray.com

Norman H. Beamer*

norman.beamer@ropesgray.com

Mark D. Rowland*

mark.rowland@ropesgray.com

Ropes & Gray LLP

1900 University Avenue

East Palo Alto, California 94303-2284

Telephone: (650) 617-4000

Facsimile: (650) 617-4090

Curtis B. Miner

curt@colson.com

Colson Hicks Eidson

255 Alhambra Circle

Penthouse

Coral Gables, Florida 33134

Telephone: (305) 476-7400

Facsimile: (305) 476-7444

Attorneys for Defendant Microsoft Corporation

Electronically served via CM/ECF

Of Counsel:

Jim S. Zeng*

jzeng@sidley.com

Theodore W. Chandler*

tchandler@sidley.com

Sidley Austin LLP

555 West Fifth Street

Los Angeles, California 90013

Telephone: (213) 896-6000

Facsimile: (213) 896-6600

John W. McBride*

jwmcbride@sidley.com

David T. Pritikin*

dpritikin@sidley.com

Douglas I. Lewis*

dilewis@sidley.com

Richard A. Cederroth*

rcederroth@sidley.com

Sidley Austin LLP

One S. Dearborn

Chicago, Illinois 60603

Telephone: (312) 853-7000

Facsimile: (312) 853-7036

Kevin J. Post*
kevin.post@ropesgray.com
Megan F. Raymond*
megan.raymond@ropesgray.com
Ropes & Gray LLP
One Metro Center
700 12th Street, N.W., Suite 900
Washington, DC 20005-3948
Telephone: (202) 508-4600
Facsimile: (202) 508-4650

**Admitted pro hac vice
Attorneys for Plaintiff
Motorola Mobility, Inc.
Electronically served via CM/ECF*

Kevin C. Wheeler*
kwheeler@sidley.com
Brian R. Nester*
bnester@sidley.com
Sidley Austin LLP
1501 K Street, N.W.
Washington, DC 20005
Telephone: (202) 736-8000
Facsimile: (202) 736-8711

Tung T. Nguyen*
tnguyen@sidley.com
Sidley Austin LLP
717 North Harwood
Suite 3400
Dallas, Texas 75201
Telephone: (214) 981-3300
Facsimile: (214) 981-3400

**Admitted pro hac vice
Attorneys for Defendant
Microsoft Corporation
Electronically served via CM/ECF*