

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

IN RE: APPLE iPhone 3G AND 3GS  
"MMS" MARKETING AND SALES  
PRACTICES LITIGATION

THIS DOCUMENT RELATES TO ALL  
CASES

MDL NO. 2116

2:09-md-2116

SECTION: J

JUDGE BARBIER  
MAG. JUDGE WILKINSON

**MOTION TO COMPEL FURTHER DISCOVERY RESPONSES  
FROM DEFENDANT AT&T MOBILITY, LLC**

Plaintiffs, through the undersigned, move the Court for an order compelling ATTM to produce meaningful responses to the discovery Plaintiffs directed to ATTM's arbitration claims.

Despite Plaintiffs' best efforts to resolve this discovery dispute outside of motion practice, the parties were unable to reach an agreement. For this reason, and for all of the reasons expressed in the attached Memorandum in Support, Plaintiffs pray that their motion is granted.

Dated: October 15, 2010

Respectfully submitted,

**MARTZELL & BICKFORD**  
SCOTT R. BICKFORD, T.A.

/s/Scott R. Bickford

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon all counsel of record via ECF this 15th day of October, 2010.

/s/ Scott R. Bickford

SCOTT R. BICKFORD