

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

TriQuint Semiconductor, Inc., a Delaware corporation,

Plaintiff/Counterdefendant,

v.

Avago Technologies Limited, a Singapore corporation; Avago Technologies U.S., Inc., a Delaware corporation, Avago Technologies Wireless IP (Singapore) Pte., Ltd., a Singapore corporation,

Defendants/Counterclaimants.

CIVIL ACTION NO. 11-91114

**PLAINTIFF'S MOTION TO COMPEL NON-PARTY SKYWORKS SOLUTIONS, INC.
TO PRODUCE DOCUMENTS REQUESTED IN THE SUBPOENA DUCES TECUM**

Plaintiff TriQuint Semiconductor, Inc., ("TriQuint") moves the Court to compel non-party Skyworks Solutions, Inc. ("Skyworks") to produce documents requested in the subpoena duces tecum served on September 15, 2010. TriQuint has subpoenaed a narrow range of documents from Skyworks, but despite Skyworks' confirmation that it is in possession of documents responsive to the subpoena and numerous meet and confer conversations between the parties over the past seven months, Skyworks has refused to search for and produce all documents responsive to TriQuint's request.

WHEREFORE, for the reasons set forth more fully in the accompanying memorandum and affidavit, Skyworks should be ordered to produce documents responsive to the subpoena.

Dated: May 5, 2011

Respectfully submitted,

TRIQUINT SEMICONDUCTOR, INC.,

/s/ Allison D. Burroughs
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-and-

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LOCAL RULE 7.1 AND 37.1 CERTIFICATION

I hereby certify that counsel for Plaintiff conferred with counsel for Skyworks and attempted in good faith to resolve or narrow the issues presented in this motion. Laura Ewbank, Katherine Galipeau, Susan Foster and/or Debra Bernard on behalf of TriQuint, and Robert Terry and/or Dan Sasse on behalf of Skyworks, conferred by telephone on October 5, 15, and 21, 2010, November 2, 2010, December 7, 2010, February 25, 2011, March 10, 2011, April 15 and 19, 2011, and May 3, 2011.

/s/ Allison D. Burroughs

CERTIFICATE OF SERVICE

I hereby certify that, on May 5, 2011, a copy of the foregoing document was filed through the electronic filing system and served by email and first class mail to counsel for Skyworks and counsel for Avago Technologies.

/s/ Allison D. Burroughs