

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VERTICAL COMPUTER SYSTEMS, INC.

Plaintiff,

v.

**LG ELECTRONICS MOBILECOMM U.S.A.,
INC., LG ELECTRONICS, INC., SAMSUNG
ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC.**

Defendants.

CIVIL ACTION NO. 2:10-CV-490

**LG ELECTRONICS MOBILECOMM U.S.A., INC. AND LG ELECTRONICS INC.'S
MOTION TO SEAL THEIR MOTION TO SEVER AND TRANSFER CLAIMS**

Defendants LG ELECTRONICS MOBILECOMM U.S.A., INC. AND LG ELECTRONICS INC. ("LGE") submit this Unopposed Motion for Leave to File Under Seal its Motion to Sever and Transfer Claims to the United States District Court for the District of New Jersey or in the Alternative to the Northern District of California.

LGE's Motion to Sever and Transfer Claims to the United States District Court for the District of New Jersey or in the Alternative to the Northern District of California contains confidential information, and as a protective order has not yet been entered, LGE respectfully moves for leave to file their Motion to Sever and Transfer Claims under seal.

Plaintiff Vertical Computer Systems, Inc. and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. are not opposed to the relief sought by this motion, and LGE therefore requests that the Court enter an order allowing LGE to file its Motion to Sever and Transfer Claims to the United States District Court for the District of New Jersey or in the Alternative to the Northern District of California under seal.

Dated: July 31, 2012

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ David J. Healey

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**Counsel for Defendants
LG ELECTRONICS MOBILECOMM
U.S.A., INC. AND LG ELECTRONICS,
INC.**

CERTIFICATE OF CONFERENCE

The undersigned hereby certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h). Counsel for Plaintiff and Samsung have indicated that this motion is unopposed.

/s/ David J. Healey _____

David J. Healey

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 31, 2012 upon all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by first class mail.

/s/ David J. Healey _____

David J. Healey