

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

MIRROR WORLDS, LLC

Plaintiff,

v.

APPLE, INC.

Defendant.

Civil Action No. 6:08-CV-88 LED

JURY TRIAL DEMANDED

**MOTION FOR ENTRY OF REVISED AGREED PROTECTIVE ORDER
PURSUANT TO THE COURT'S ORDER OF JULY 8, 2009**

Pursuant to the Court's Order of July 8, 2009, Mirror Worlds, LLC herewith submits an agreed version of the proposed protective order, attached as Exhibit A, that includes the safeguards Magistrate Judge Love described in his recent opinion in *Document Generation Corp. v. Allscripts, LLC*, 6:08cv479, 2009 WL 1766096 (E.D. Tex. June 23, 2009).

Counsel for Mirror Worlds, LLC has conferred with counsel for Apple, Inc., and Apple has no objection to entry of the revised Agreed Protective Order. Accordingly, Mirror Worlds, LLC respectfully requests that the Court enter the attached revised protective order.

Respectfully submitted,

BY: /s/ Deborah Race

Otis Carroll, *Lead Counsel*

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Deborah Race

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ATTORNEYS FOR PLAINTIFF,
MIRROR WORLDS, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), movant has contacted opposing counsel and was informed that opposing counsel agrees to the relief requested herein.

/s/ Deborah Race

Attorney for Movant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document this 29th day of July, 2009, via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Deborah Race