

**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

APPLE INC.

Counterclaim Plaintiff

v.

MIRROR WORLDS, LLC,
MIRROR WORLDS TECHNOLOGIES, INC.,

Counterclaim Defendants.

**MOTION FOR AN EXPEDITED BRIEFING SCHEDULE AND
EXPEDITED CONSIDERATION OF MIRROR WORLDS LLC'S MOTION TO
PRECLUDE APPLE'S AMENDED INVALIDITY CONTENTIONS AND TO STRIKE
PORTIONS OF THE EXPERT REPORT OF STEVEN K. FEINER, PH.D. REGARDING
INVALIDITY**

Plaintiff Mirror Worlds, LLC seeks an expedited briefing schedule with respect to its Motion to Preclude Apple's Amended Invalidity Contentions and to Strike Portions of the Expert Report of Steven K. Feiner, Ph.D. Regarding Invalidity (the "Motion to Strike"). Mirror Worlds requests that the opposition to its motion be due on June 2, 2010. Mirror Worlds believes expedited briefing is needed due to the impending June 4th due date for rebuttal expert reports; otherwise, as set forth in its Motion to Strike, Mirror Worlds will be forced to undertake the unduly burdensome and prejudicial effort of addressing Apple's new arguments and 160 new

prior art references. The June 2, 2010 deadline is appropriate because Mirror Worlds LLC's motion is a re-filing of a motion that was originally served on Apple just after midnight on May 29th. Mirror Worlds LLC also requests that the Court consider the motion on an expedited basis because Apple has requested burdensome additional third party discovery that relates to matters that Mirror Worlds LLC seeks to strike.

Dated: June 1, 2010

Respectfully submitted,
By: /s/ Alexander Solo
Otis Carroll, *Lead Counsel*
(Texas States Bar No. 03895700)
Deborah Race (Texas State Bar No. 16448700)
IRELAND CARROLL & KELLEY, P.C.
6101 S. Broadway, Suite 500
Tyler, Texas 75703
Tel: (903) 561-1600
Fax: (903) 581-1071
Email: Fedserv@icklawn.com

Joseph Diamante (*Pro Hac Vice*)
Kenneth L. Stein (*Pro Hac Vice*)
Ian G. DiBernardo (*Pro Hac Vice*)
Alexander Solo (*Pro Hac Vice*)
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, N.Y. 10038
Tel: (212) 806-5400
Fax: (212) 806-6006
Email: kstein@stroock.com
ATTORNEYS FOR MIRROR WORLDS, LLC

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 1st day of June, 2010, via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alexander Solo

CERTIFICATE OF CONFERENCE

The undersigned counsel hereby certifies that Mirror World LLC's counsel has in good faith conferred Apple's counsel in an effort to resolve the dispute without court action. Counsel of record for Mirror Worlds (Ian G. DiBernardo and Alexander Solo) conducted a telephonic meet and confer with Apple's counsel of record (Allan Soobert) on May 28, 2010 which ended in an impasse.

/s/ Alexander Solo