

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

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

**SONY CORPORATION OF AMERICA,
ET AL.**
Defendants.

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**CASE NO. 6:10-CV-373
PATENT CASE**

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

DISK DOCTORS LABS, INC., ET AL.
Defendants.

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**CASE NO. 6:10-CV-471
PATENT CASE**

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

**NATIONAL INSTURMENTS COPR., ET
AL.**
Defendants.

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**CASE NO. 6:10-CV-472
PATENT CASE**

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

ENGRASP, INC., ET AL.
Defendants.

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**CASE NO. 6:10-CV-591
PATENT CASE**

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

BMC SOFTWARE, INC., ET AL.
Defendants.

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CASE NO. 6:10-CV-636
PATENT CASE

UNILOC USA, INC., ET AL.
Plaintiffs,

vs.

FOXIT CORPORATION, ET AL.
Defendants.

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CASE NO. 6:10-CV-691
PATENT CASE

SYMANTEC CORPORATION, ET AL.
Plaintiffs,

vs.

UNILOC USA, INC., ET AL.
Defendants.

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CASE NO. 6:11-CV-33
PATENT CASE

JOINT MOTION FOR ENTRY OF DISCOVERY ORDER

Pursuant to the Court’s May 20, 2011 Order, Uniloc, Activision, Adobe, Aladdin, BMC, Digital River, EA, Filemaker, Foxit, Freedom Scientific, GeoSpatial, Intego, Intuit, Magix, McAfee, National Instruments, Onyx, Pinnacle, Safenet, Solar Winds, Sonic, Sony, Symantec, Transmagic, and Wildpackets move the Court for entry of the attached Discovery Order. As reflected in the certificate of conference attached hereto, 57 of the 60 defendants in all the related cases have complied with the meet and confer requirements in Local Rule CV-7(h). While not

all parties have expressly joined in this motion, no party has expressed opposition to the Discovery Order requested by this motion.

By: /s/ Paul J. Hayes (w/permission Wes Hill)

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for 57 of the 60 defendants has complied with the meet and confer requirements in Local Rule CV-7(h). This motion is consented to and not opposed by the parties listed below. Some parties have not participated.

The Court Issued its Order on May 20, 2011. Uniloc emailed to all defendants a proposed Discovery Offer on May 22, 2011. A group of defendants circulated a counter-proposal on May 26th. Seven group telephonic conferences were held May 27, 2011. Counsels for Uniloc and various defendants exchanged numerous emails between May 22, and May 31, 2011. Uniloc circulated modifications on May 30, 2011. A group of defendants responded with additional changes. A final meet and confer was conducted by telephone on May 31, 2011 with counsels for a number of the parties. At the time of filing, twenty-seven (27) parties consented to the Joint Proposed Discovery Order.

Parties consenting to the Joint Propose Discovery Order

Uniloc entities (2), Activision, Adobe, Aladdin entities (2), BMC, Digital River, EA, Filemaker, Foxit, Freedom Scientific, GeoSpatial, Intego, Intuit, Magix, McAfee, National Instruments, Onyx, Pinnacle, Safenet, Solar Winds, Sonic, Sony, Symantec, Transmagic, Wildpackets

/s/ Wesley Hill

Wesley Hill

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 through the Court's CM/ECF system per Local Rule CV-5(a)(3) on the 31st day of May, 2011.

/s/ Wesley Hill

Wesley Hill