

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

BISHOP DISPLAY TECH LLC	§	
v.	§	
	§	Case No. 2:21-CV-00136-JRG
SAMSUNG ELECTRONICS CO., LTD.,	§	
et al.	§	

BISHOP DISPLAY TECH LLC	§	
v.	§	
	§	Case No. 2:21-CV-00139-JRG
SAMSUNG ELECTRONICS CO., LTD.	§	
et al.	§	

JOINT NOTICE REGARDING CONSOLIDATION

Pursuant to the Court’s October 20, 2021 Orders in Case No. 2:21-CV-00136 (ECF 45) and in Case No. 2:21-CV-00139 (ECF 44), the parties have met and conferred about the feasibility of consolidating Case Nos. 2:21-cv-136 and 2:21-cv-139.

The parties agree in principle that the two cases should be consolidated for discovery purposes. However, given the large number of unrelated asserted patents (13 patents from 11 different patent families) and accused products (more than 1,500), Defendants respectfully request that the same page limits apply for briefing (e.g., claim construction briefing, dispositive motions, Daubert motions, and motions in limine) as would apply to the two separate cases typically. The parties are submitting proposed Docket Control Orders, Discovery Orders, and Protective Orders in each case that envision such consolidation.

At this time, the parties are unable to agree about the feasibility of consolidating the cases for trial.

Dated: October 27, 2021

Respectfully submitted,

/s/ Patrick J. Conroy

Justin B. Kimble
justin@nelbum.com
Patrick J. Conroy
pat@nelbum.com
Ryan P. Griffin
ryan@nelbum.com
T. William Kennedy, Jr.
bill@nelbum.com
Jonathan H. Rastegar
jon@nelbum.com
Nelson Bumgardner Conroy PC
2727 N. Harwood Street
Suite 250
Dallas, TX 75201
817-377-9111

John P. Murphy
Murphy@nelbum.com
Nelson Bumgardner Conroy PC
3131 W. 7th Street
Suite 300
Ft. Worth, TX 76107
817-806-3808

*Attorneys for Plaintiff
Bishop Display Tech LLC*

/s/ Melissa Richards Smith

Neil P. Sirota
neil.sirota@bakerbotts.com
Robert L. Maier
Robert.maier@bakerbotts.co
Eric J. Faragi
eric.faragi@bakerbotts.com
Baker Botts L.L.P.
30 Rockefeller Plaza
New York, NY 10112
212-408-2500

David J. Tobin
david.tobin@bakerbotts.com
Baker Botts L.L.P.
2001 Ross Avenue
Dallas, TX 75201
214-661-4869

Melissa Richards Smith
melissa@gillamsmithlaw.com
Gillam & Smith LLP
303 South Washington Avenue
Marshall, TX 75670
903-934-8450

*Attorneys for Defendants Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.*

/s/ Melissa Richards Smith

Melissa Richards Smith
melissa@gillamsmithlaw.com
Gillam & Smith LLP
303 South Washington Avenue
Marshall, TX 75670
903-934-8450

Robert Thomas Haslam, III
rhaslam@cov.com
Covington & Burling LLP

3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306
650-632-4800

Daniel W. Cho
dwcho@cov.com
David Cho
djcho@cov.com
Jared Frisch
jfrisch@cov.com
Jeffrey Lerner
jlerner@cov.com
Kee Young Lee
kylee@cov.com
Covington & Burling LLP
850 10th Street NW
Washington, DC 20001
202-662-5052

Hyun Sik Byun
hbyun@cov.com
Covington & Burling LLP
333 Twin Dolphin Frice
Suite 700
Redwood Shores, CA 94065

*Attorneys for Defendant Samsung
Display Co, Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel listed above and counsel who are deemed to have consented to electronic service on October 27, 2021.

/s/ Patrick J. Conroy