

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MONUMENT PEAK VENTURES, LLC,

Plaintiff

v.

TCL ELECTRONICS HOLDINGS LTD., TCL
TECHNOLOGY GROUP CORPORATION, TCL
INDUSTRIES HOLDINGS Co., LTD., TCL
COMMUNICATION TECHNOLOGY HOLDINGS
LIMITED, TCT MOBILE WORLDWIDE LTD.,
TCT MOBILE INTERNATIONAL LTD., HUIZHOU
TCL MOBILE COMMUNICATION Co. LTD., AND
TCL COMMUNICATION LTD.,

Defendants.

Civil Action No. 5:24-cv-00011-RWS-JBB

JOINT MOTION TO ENTER DISCOVERY ORDER

Following the Court's guidance from the May 1, 2024 Scheduling Conference, Plaintiff and Defendants (subject to Defendants' Motion to Dismiss (Dkt. No. 12)), file this Joint Motion to Enter Discovery Order.

Date: May 1, 2024

Respectfully submitted,

/s/Nick Kliewer (with permission)
Casey Griffith
Texas Bar No. 24036687
Casey.Griffith@griffithbarbee.com
Michael Barbee
Texas Bar No. 24082656
Michael.Barbee@griffithbarbee.com
Nicholas Kliewer
Texas Bar No. 24083315
Nick.Kliewer@griffithbarbee.com
Griffith Barbee PLLC
One Arts Plaza
1722 Routh Street, Suite 910
Dallas, Texas 75201
Tel. (214) 446-6020
Fax. (214) 446-6021

COUNSEL FOR PLAINTIFF

/s/ Jennifer H. Doan
Jennifer H. Doan
Texas Bar No. 08809050
Joshua R. Thane
Texas Bar No. 24060713
HALTOM & DOAN
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: jthane@haltomdoan.com

Robert M. Siminski (P44319)
rmsiminski@harnessip.com
Glenn E. Forbis (P52119)
gforbis@harnessip.com
J. Bradley Luchsinger (P76115)
bluchsinger@harnessip.com
HARNESS, DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Suite 200
Troy, MI 48098
Tel.: 248-641-1600

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on May 1, 2024.

/s/ Jennifer H. Doan
Jennifer H. Doan

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rule CV-7(h), counsel for Defendants conferred with counsel for Plaintiff. All parties agree to the filing of this joint motion.

/s/ Jennifer H. Doan
Jennifer H. Doan