

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

KONINKLIJKE KPN N.V.,

Plaintiff,

v.

TELEFONAKTIEBOLAGET LM
ERICSSON and ERICSSON INC.,

Defendants.

C.A. No. 2:22-cv-282

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL

COMES NOW Plaintiff, Koninklijke KPN N.V. (“KPN”), and hereby files this Motion for leave to file under seal its Complaint against Telefonaktiebolaget LM Ericsson and Ericsson Inc. A Protective Order has not yet been entered in this case and the complaint needs to be filed under seal as the material contains confidential information.

A proposed order is submitted herewith.

Date: July 25, 2022

Respectfully submitted,

/s/ Lexie G. White by permission T. John
Ward, Jr.

Lexie G. White
Texas State Bar No. 24048876
lwhite@susmangodfrey.com
SUSMAN GODFREY, L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Andres C. Healy
Washington State Bar No. 45578

ahealy@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1201 Third Avenue Suite 3800
Seattle, WA 98101-3000
Telephone: (206) 505-3843
Facsimile: (206) 516-3883

T. John Ward, Jr.
TX State Bar No. 00794818
E-mail: jw@wsfirm.com
Claire Abernathy Henry
TX State Bar No. 24053063
E-mail: claire@wsfirm.com
WARD, SMITH & HILL, PLLC
P.O. Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

Attorneys for Koninklijke KPN N.V.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record by email on this 25th day of July, 2022.

/s/ T. John Ward, Jr.