

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

WAPP TECH LIMITED PARTNERSHIP, ET AL.		DOCKET 4:25-CV-230
VS.		OCTOBER 27, 2025
		11:08 A.M.
APPLE, INC., ET AL.		SHERMAN, TEXAS

VOLUME 1 OF 1, PAGES 1 THROUGH 25

REPORTER'S TRANSCRIPT OF CASE MANAGEMENT CONFERENCE

BEFORE CHIEF JUDGE AMOS L. MAZZANT, III,
UNITED STATES DISTRICT JUDGE

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1 (Open court, all parties present via Zoom.)

2 THE COURT: Good morning, everyone. This is Judge
3 Mazzant, and we're here in 4:25-cv-230, *Wapp Tech Limited*
4 *Partnership, et al. versus Apple, Inc., et al.*

5 You've already made your appearances. Just
6 identify yourself every time you speak. It sounds like --
7 and the only reason I set this for, well, videoconference
8 to go ahead and proceed, there were just a few issues, I
9 think, that were in dispute, so I wanted to go ahead and
10 address those.

11 So I think, Mr. Moore, if you are going to address
12 those, I'll let you go first, and then I'll have Plaintiff
13 respond to that.

14 MR. MOORE: Thank you, your Honor.

15 Good morning. The first issue I'd like to discuss
16 would be the timing for claim narrowing.

17 We understand that this Court has got a model
18 order it uses for claim narrowing, and that's for the
19 typical case. But this is not the typical case. This
20 case, as it currently stands, involves five patents and
21 over 200 claims. So if the parties go forward with the
22 case in this posture, the parties and the Court are going
23 to waste hundreds of hours on claims that are never going
24 to see the light of day. We know the case won't go to
25 trial with more than eight claims against a party. So to

1 let it go forward with 200 claims and five patents is a
2 waste of judicial resources and the parties' resources.

3 And here, Wapp is in a particularly strong
4 situation to make its selections early in the case. As
5 Wapp has been recently telling the Patent Office, it's
6 already litigated these patents six times. It's already
7 received invalidity contentions from four different
8 Defendants. It's already received multiple claim
9 constructions. This is not your typical case. This is
10 just like the Federal Circuit's *In Re: Katz* case where
11 you've got a Plaintiff that's got extensive litigation
12 history with these patents, so early claim limits are more
13 important.

14 And I stress this *In Re: Katz* case from the
15 Federal Circuit because that case used the exact timings
16 that we're proposing for our claim limits, and the Federal
17 Circuit blessed and affirmed that. It came out of the
18 Eastern District of Texas where the Court ordered the
19 Plaintiff, in an 18-patent case with 450 asserted claims,
20 to limit their case to 40 claims pre-invalidity contentions
21 and 16 claims pre-claim construction. That came out of the
22 Eastern District of Texas, went up on appeal to the Federal
23 Circuit, and was affirmed. And that's exactly the proposal
24 we're putting forth here. We've just adapted the number of
25 claims and number of prior art limits from the Eastern

1 District of Texas model order.

2 And we think, taking the first -- for example, 32
3 claims, this is not a strict limit. 32 claims is four
4 times as many claims as they'll ever take to trial.
5 They're never going to take more than eight claims to
6 trial, so that's four times the number of claims that they
7 need.

8 And even when we get down to 16 claims pre-claim
9 construction, that's two times the number of claims they
10 need. And by getting down to 16 claims pre-claim
11 construction, that will greatly benefit the Court because
12 it will limit the number of claim terms at issue for
13 *Markman* and claim construction.

14 So we think these limits are perfectly appropriate
15 in this case because of the extensive litigation history,
16 the Federal Circuit precedent. Thank you, your Honor.

17 THE COURT: Mr. Moore, let me just ask you. You
18 know, generally unless the parties reach some agreement,
19 the Court has typically just followed the model rule. So
20 why should the Court deviate from that practice?

21 MR. MOORE: Because in this case, we've got a
22 Plaintiff with -- well, two reasons. One, because this
23 case is so large and so complex, five patents and over 200
24 claims, this makes this more complex and more burdensome on
25 the Defendants than the typical case.

1 And, second, we've got a Plaintiff with such an
2 extensive litigation history. In the typical case, I
3 understand a Plaintiff hasn't litigated their patents
4 before, they've never seen invalidity contentions, they've
5 never entered a claim construction. They might need more
6 flexibility to do it.

7 Even if you look in the Eastern District of Texas
8 model order, Footnote 1 says the parties should look for
9 more strict limits depending on the case and that those
10 limits should be customized for the case.

11 And because of the large number of patents, large
12 number of claims, and the Plaintiff's extensive litigation
13 history with these patents, we think it warrants modifying
14 those rules to save the parties hundreds and hundreds of
15 hours and to save the Court many, many hours to make this
16 process more efficient because this Plaintiff, unlike a
17 typical plaintiff, is in a much better position to make
18 those selections now.

19 THE COURT: Okay. Thank you.

20 Let me go ahead -- I know you have multiple
21 issues, but let's go ahead and hear a response and take
22 each issue by itself.

23 Who is going to respond?

24 MR. HARRIS: Good morning, your Honor. Alden
25 Harris on behalf of the Plaintiff.

1 I think you hit upon exactly the right question
2 when you asked why not just use the model order. We have
3 expressed, both to Defendants and in our filing with the
4 Court, our willingness to agree to the model order, and we
5 have also agreed to something that was very similar to the
6 model order in the prior *Wapp versus Chase* case. So we're
7 not opposed to the concept of claim narrowing; we're very
8 much in favor of it. But we want to use the deadlines that
9 are in the model order, and we think those deadlines make
10 sense.

11 I mean, first of all, I want to note this isn't is
12 a 200-claim case. We haven't even served our infringement
13 contentions yet. And when we serve those contentions,
14 we're not going to assert every single claim, so there
15 already will be some voluntary narrowing just when we serve
16 our contentions.

17 But, beyond that, we need to get through the
18 claim-construction process before we go down to the really
19 aggressive narrowing, and that's what the model order
20 provides. Why is it important to go through the
21 claim-construction process? Well, of course, we all
22 understand that that gives a lot of clarity to the claims.

23 Furthermore, your Honor probably recalls the
24 *Markman* hearing in the last case. There were nine disputed
25 terms, and six of those terms were indefiniteness

1 arguments.

2 And so until we know what claims the Defendants
3 are trying to knock out on things like indefiniteness, we
4 can't -- and whether those claims, in fact, get knocked
5 out, we can't intelligently know what claims to narrow down
6 to until we see how those challenges turn out.

7 So, in sum, your Honor, we would ask to just go
8 with the model order, and that's the position that we've
9 consistently taken in this case and in prior cases, your
10 Honor.

11 THE COURT: And so, Mr. Harris, what about
12 Mr. Moore's argument that there has been a lot of
13 litigation over these patents before this Court? So why is
14 that not a unique circumstance to basically say maybe we
15 should deviate from the model order since probably all --
16 you probably are in a much better position, because of all
17 this litigation, to know what claims you truly are going to
18 assert.

19 MR. HARRIS: Well, your Honor, of course, we will
20 be responsible in the claims that we assert when we serve
21 our infringement contentions, and, as I said, we're not
22 going to assert all 200 claims. We will use the benefit of
23 our knowledge to narrow this case to the claims that we
24 think are appropriate to assert here.

25 But, of course, as Defendants will tell you when

1 we get to the *Markman* process, they are entitled to make
2 their own arguments that the prior Defendants didn't make,
3 and they may assert new challenges particularly on things
4 like indefiniteness in an attempt to knock out claims.

5 And so until we know what are the challenges being
6 asserted -- these new challenges that we won't have seen
7 before -- and what's the outcome of that challenge looking
8 like, only at that point can we have an understanding of
9 what claims make sense to proceed forward with in light of
10 that claim-construction process.

11 And so our view is that that's why the model order
12 is set up that way, and that claim-construction process is
13 going to happen anew here. It's not going to be the same
14 as in the prior cases. Hopefully, presumably, they won't
15 be raising the same arguments.

16 So we need the benefit of that process, your
17 Honor. But to be clear, we will responsibly use the
18 information that we have gained from the history of this
19 patent -- or this portfolio's litigation in determining
20 what claims to assert in the first instance here, and it
21 won't be all 200.

22 THE COURT: Mr. Harris, in addition, you know,
23 this Court has had multiple *Markmans* on this case and one
24 very recently, and, of course, I didn't revisit past
25 constructions. So I just wonder where -- what position you

1 are in at this point to try to narrow.

2 Now, I know that in the materials in the case
3 management report, it's been indicated that the parties --
4 you're open to narrowing, I assume beyond what the model
5 rule says, the model order says.

6 MR. HARRIS: Are we open to narrowing beyond what
7 the model order says?

8 THE COURT: Well, I'm just working with the other
9 side to narrow it some. The case management report
10 indicates that the parties -- that you are open to some
11 negotiation on narrowing it. I know your preference is to
12 go with the model rule, but am I incorrect on that that you
13 are still open to narrowing it some?

14 MR. HARRIS: Yeah. We're open to having a
15 conversation with the Defendants about that and whether we
16 should go beyond the model order. You know, as I said, our
17 preference is the model order, but we're willing to have
18 that conversation.

19 But Defendants' proposal is just to take the model
20 order and push all the deadlines up by four months, which
21 is a huge -- a huge difference and really changes the
22 parameters of that model order.

23 So we're very happy to -- and we've expressed to
24 them we're happy to meet and confer about tweaking the
25 model order, adjusting it in certain ways as necessary.

1 But the radical degree of modification of the model order
2 here and pushing everything so far -- so early in the case,
3 before claim construction has even kicked off, let alone
4 concluded, is just -- is just too extreme and requires us
5 to guess.

6 I mean, we don't even have their invalidity
7 contentions. We don't know what terms they are arguing are
8 indefinite. We don't know what terms they're going to try
9 to construe. It requires us to guess about their strategy
10 in a way that we think is too prejudicial, your Honor, to
11 do it so early.

12 THE COURT: Okay. Thank you.

13 Mr. Moore, would you like to respond to that? And
14 for the *In Re: Katz* case, I confess, if I've read it, I
15 don't remember. Do you have the cite for that?

16 MR. MOORE: Yes, your Honor. The cite for the
17 *In Re: Katz* case is 639 F.3d 1303, and the pinpoint cite
18 would be 1311 through 1313. And that's the Federal
19 Circuit, 2011.

20 THE COURT: Okay. Thank you.

21 But if you would like to respond, then.

22 MR. MOORE: Yes, your Honor, briefly.

23 There is always going to be some variable, but the
24 limitations that were used in the *Katz* case take in account
25 for that, the timing. That's why they would be allowed 32

1 claims initially. Based on their previous litigation
2 history, they should be able to get down to 32 claims that
3 they are going to assert. And if that 32 comes from the
4 model order, in the *Katz* case they did 40 claims and so
5 we'd be fine with that, too -- 40, 32 -- but just to get
6 down in that universe. And that was a much more
7 complicated case, with 18 patents and 450 asserted claims.
8 I was the counsel for that in the lower court.

9 And then when you get down to the final selection
10 before claim construction, that gives them 16 claims. And
11 that gives them more than enough flexibility, when combined
12 with their litigation history, to make these claim
13 constructions because 32 claims is four times more than
14 they're going to need and 16 claims is two times what
15 they're going to need. So that builds in the flexibility
16 to make those selections early.

17 THE COURT: Okay. Thank you.

18 And then, Mr. Harris, anything else on this issue?

19 MR. HARRIS: Just one thing very briefly, which is
20 that this case, this *Katz* case they're citing, this came
21 out about two years before model order was handed down. So
22 it's not overruling the model order; it's a pre-model order
23 case. I just wanted to note that for the Court.

24 THE COURT: Thank you.

25 Well, I do want to go and read that case, and so I

1 will take this issue under advisement, so --

2 And then your next issue is the issue, I think, of
3 the trial date -- or where do you want to go, Mr. Moore?

4 MR. MOORE: We could deal with the trial date.
5 There's kind of two issues there, your Honor. There's the
6 trial date, and there's separate trials.

7 At this point we think it's premature for the
8 Court to put a trial date out there. The Court doesn't
9 know its schedule. The Court doesn't know how many
10 Defendants will still be in the case. The Court doesn't
11 know if there is going to be separate trials. Right now
12 pretrial set is set for December 7th. That's right before
13 Christmas. Are we going to have time to get this in before
14 Christmas? Will it need to be after Christmas?

15 There's too many variables to put a trial date on
16 the calendar. And, most importantly, by putting a trial
17 date on there, it would suggest there is going to be one
18 trial date for all Defendants. That's not necessarily
19 true. As the Defendants indicate, we plan to move for
20 severance of these cases because the infringement
21 contentions are based on different allegations.

22 But also in this situation, we really know why
23 Wapp wants the trial date on there, even that TBD. It's
24 because they want to prevent the Patent Office from
25 considering Capital One's IPR on the merits. They want the

1 Court to put a TBD trial date out there that suggests it
2 will be sometime close to the pretrial order so they can
3 run back to the Patent Office and say, "You shouldn't
4 consider Capital One's IPR on the merits. We're going to
5 get to trial on this case first," where we think the Patent
6 Office should be allowed to consider that on the merits.

7 THE COURT: Response?

8 MR. HARRIS: Good morning, your Honor. Alden
9 Harris on behalf of the Plaintiff.

10 Well, in terms of deleting the trial date, I mean,
11 the reasoning behind that is pretty clear, and I think
12 Counsel just stated it. They want to tell the Patent
13 Office that there is no trial date and, therefore, that
14 their IPR should be instituted, right? So they want to
15 take the trial date off in order to give the false
16 impression that who knows when this case will go to trial
17 and that it's not really set for trial in any serious
18 fashion.

19 We just want to keep it in there to make it clear
20 that this case will be set for trial, as this Court always
21 does, in a prompt fashion consistent with the Court's, you
22 know, model schedule.

23 On the issue of bifurcating the trials, that's a
24 separate issue. We think that's premature to rule on at
25 this point, but we do think there is a lot of factual and

1 legal overlap. All our infringement allegations for every
2 Defendant relates to the use of Apple's Xcode development
3 software, for example. And there will also, of course, be
4 prior art issues that overlap, et cetera.

5 So there is going to be a high degree of overlap.
6 We think one trial will make sense. But that's premature
7 at this point, whether it's going to be one trial or
8 bifurcated trials. We're very early in discovery, of
9 course, at this stage, so I don't think it's appropriate to
10 get a ruling on that one way or the other right now. But
11 we do believe the trial date should stay in the schedule as
12 the Court always puts the trial date in the schedule.

13 THE COURT: Any additional response, Mr. Moore?

14 MR. MOORE: Your Honor, no. The real key issue
15 here is, one, we think it's premature because the pleadings
16 aren't even closed, Defendants are planning to move for
17 severance, and the Court's schedule looking that far out is
18 very difficult to protect.

19 And, two, we do think that by putting a date on
20 there, it shouldn't be used to prevent the Patent Office
21 from considering Capital One's IPR on the merits.

22 THE COURT: Okay. So this is Court's, you know,
23 typical practice. I set it for final pretrial, and
24 typically what I do in my general civil docket is simply at
25 the pretrial conference we would actually fix the date for

1 the trial at that time.

2 However, in my patent docket I do something
3 different. So although we set it for pretrial conference,
4 I specially set the trial date. So what will happen is --
5 and I understand there may be issues because we'll have to
6 have separate trials, and we have done those and staggered
7 those in the past. Typically, once the first trial goes,
8 all the other ones go away based on the result of the first
9 one, but -- so it will be set for pretrial and then be
10 determined.

11 But here's what I tell the parties, is that we'll
12 have to decide, if we do, you know, try these separately --
13 which is what the Court usually does do when there's
14 multiple Defendants. I know that's an issue the Court
15 hasn't decided yet and is not before the Court yet. But
16 what I will do is ask the parties just to ask the Court for
17 a fixed trial date before we get to the pretrial
18 conference, so -- I don't know that we'll go to trial -- I
19 mean, we can certainly -- I don't have a normal trial
20 docket in December, but -- I take an annual vacation every
21 year for my wife. It's her vacation, so -- I know I'll be
22 doing that in December, but it's usually early in the month
23 so -- I don't know that anybody wants to go to trial in
24 December.

25 All that being said, is we can fix the trial date

1 for whichever case is going to go first, and we can get a
2 special setting. So I'm going to leave it the way I
3 normally do it at this point, and then we'll determine the
4 trial date really at any time the parties request it
5 because, again, we'll stay on this schedule, so --

6 And then as to the issue of separate trials,
7 that's something, you know -- this issue of severance --
8 you know, we'll do pretrial together anyways, whether we
9 try them separately or not.

10 Okay. Mr. Moore, there was one more issue, I
11 think, right, that you wanted to raise?

12 MR. MOORE: Yes.

13 The last issue is the limit on the number of
14 depositions. Defendants simply want the Court to adopt the
15 Federal Rules of Civil Procedure limit on number of
16 depositions. Under the Federal Rules of Civil Procedure,
17 Rule 30, a party is limited to ten depositions without
18 leave of Court. We simply want the Court to impose that
19 limit. The Federal Rules of Civil Procedure put a limit on
20 the number of depositions because they want to motivate
21 parties to take depositions efficiently and not waste
22 resources.

23 Here, we don't think it's appropriate to remove
24 that limit, like Wapp wants to, where they haven't shown
25 good cause to remove that limit and we haven't even started

1 discovery.

2 In this case, it's already staggeringly
3 disproportionate in discovery. Wapp only has one fact
4 witness. And even according to the Federal Rules of Civil
5 Procedure, each Defendant is going to have ten, so there's
6 already ten times more Defendant depositions than
7 Plaintiff's fact depositions. But they are not happy with
8 that limit. They want even more depositions.

9 And by removing the number of depositions and just
10 having an hour limitation, that's fraught for mischief and
11 it creates an undue burden on the Defendants. It's fraught
12 for mischief because the Plaintiff can take a number of
13 two- and three-hour depositions of the Defendants. And
14 that burden for the Plaintiff to take a two- or three-hour
15 deposition, it only takes two or three hours. They take
16 the deposition outline they used from the last deposition.
17 They go and take the two- or three-hour deposition.

18 But for each new witness you ask for Defendants,
19 that takes at least 40 or 50 hours of man time to do that
20 deposition.

21 So not only do we already have one fact deposition
22 versus ten, they want to make that disproportionately
23 higher by taking a number of shorter depositions that will
24 take the Defendants a huge amount of time to prepare for,
25 without doing what the Federal Rules of Civil Procedure

1 require, without yet showing good cause and by doing that
2 before discovery even starts.

3 Thank you.

4 THE COURT: Response, Mr. Harris?

5 MR. HARRIS: Good morning, your Honor. Alden
6 Harris on behalf of the Plaintiff.

7 First of all, the proposed limit on depositions
8 here, we have agreed to 50 hours. That's less than what
9 the Federal Rules require, so we've already agreed to
10 something less than the 70 hours that we would be permitted
11 to take under the default Federal Rules. That's going to
12 ensure efficiency. That's going to ensure that there is
13 no, you know, abuse of depositions. And, of course, we
14 don't intend to take any more depositions than we need to,
15 only the fewest that we need to take, and that's why we've
16 agreed to that 50-hour limit.

17 Number 2, your Honor, this case, like prior cases,
18 is heavily about the use of the accused product, the use of
19 Xcode and Android Studio by developers within these
20 companies. And in prior cases, we've had to take a lot of
21 depositions because we've had to understand how these
22 individual developers use this software. And so it may be
23 necessary to take more than ten short depositions of
24 developers in order to make our case, and so there is
25 something unique about this case that's different from

1 others in that we need to show this use by developers and
2 that's going to require probably more than ten depositions.

3 And, finally, your Honor -- and this is very
4 important -- we proposed -- as a compromise to the other
5 side, we said we'll agree to what you're saying here if you
6 agree that your 30(b)(6) deposition only counts as one
7 witness, because, otherwise, we can't control how many
8 30(b)(6) representatives you put up. You might put up five
9 or six or seven, and that would eat up more than half of
10 our witnesses. So if you'll agree that your 30(b)(6) rep
11 is one witness and that upon good cause we can move to
12 enlarge the limits if necessary, we'll agree to your
13 proposal of ten witnesses. And they rejected that. And
14 what that tells you is they intend to do exactly what we're
15 concerned about. They intend to designate a bunch of
16 30(b)(6) representatives and game these limits.

17 And so given all of those considerations -- the
18 50-hour limit that keeps us reined in, the fact that this
19 is a unique case where we need to depose developers, and
20 the fact that the way that they proposed these limits is
21 subject to gamesmanship -- we, unfortunately, can't agree
22 to what they are proposing here, and we would ask the Court
23 not impose a numerical limit on witnesses.

24 THE COURT: And, Mr. Moore, in response, why isn't
25 their agreement for 50 hours -- why is that not sufficient

1 to curtail this?

2 MR. MOORE: Because we would rather give them more
3 hours than more witnesses. Every individual new witness we
4 need to put up creates a disproportionate burden on them
5 because we've got to go collect all their documents, we've
6 got to spend time with them preparing them for the
7 deposition before -- even though it's only a 2- or 3-hour
8 deposition, we still have to go through the formalities of
9 reviewing all of their documents, spending time preparing
10 them for the deposition the day before, making them
11 available for the deposition. So even though it's a short
12 deposition, we have to go through the formalities of a
13 deposition for that witness.

14 It also takes another Defendant's engineer out of
15 the office for two days because they've got to spend a day
16 with us for prep, the day with us for the deposition. Even
17 though it's only a two-hour or three-hour deposition,
18 they've got to come to our office. So it's very
19 disproportionate. We would rather give them more hours
20 than more numbers of deposition.

21 And I heard from the argument they learned from
22 the previous litigations. You would think that previous
23 litigation history would make them more efficient, not
24 less, which is why they agreed to the 50-hour limit.

25 THE COURT: Mr. Harris, anything else on this?

1 MR. HARRIS: Nothing further, your Honor.

2 THE COURT: So, you know, this issue cuts both
3 ways. I mean, part of me will say, well, if I just go with
4 the standard rule in terms of the number of depositions --
5 although I would probably be very liberal in granting
6 additional depositions or giving them a certain number of
7 hours, and if for some reason that's abused in some way,
8 then the Court can address it in other ways.

9 So I think what I'm going to do is -- and, again,
10 a lot of times this is an issue that the parties usually
11 cooperate and can come to some agreement. There is a
12 dispute now, so I'm just going to give you the 50 hours.
13 But I will tell Mr. Moore, and for the Defendants, if for
14 some reason this is abused, then come back to the Court.

15 And then one thing, the Court makes itself
16 available. So if there is an issue coming up, of course,
17 you can file a motion. But if it's a discovery-related
18 matter, you have to call the Court first anyways before you
19 can go ahead and proceed, and we'll do it by video or
20 telephone. And so there is a mechanism here that if
21 somehow it is being abused in some way, we can revisit it.

22 So I will go ahead and given you the 50 hours,
23 but, you know, I would hope that everyone would do that in
24 an efficient and fair-minded manner.

25 And then, Mr. Moore, I think that's all you had to

1 deal with, correct?

2 MR. MOORE: Correct, your Honor. Thank you.

3 THE COURT: Okay. And then I know that y'all are
4 in -- at least the management report indicated that you're
5 going to be submitting an e-discovery order that's agreed.
6 So when that's submitted, I'll sign that.

7 And then as to the issue of mediation, has there
8 been any discussion about a possible mediator in the case,
9 or do you want the Court just to pick somebody or --

10 MR. HARRIS: Your Honor, Alden Harris for the
11 Plaintiff.

12 Wapp has proposed Judge Folsom. He has
13 mediated -- I believe successfully -- every other Wapp
14 case, and so we think he makes the most sense.

15 When we spoke to Defendants about it, I think they
16 said they just weren't ready to agree to any particular
17 mediator, but I'll let them speak for themselves. But
18 Wapp's proposal would certainly be Judge Folsom.

19 THE COURT: Well, and Judge Folsom has done, I
20 think, all the mediations in the case and the posttrial as
21 well on the last one and resolved it.

22 Mr. Moore, or does somebody else want to speak on
23 that?

24 MR. MOORE: We have no -- I have no objection to
25 Judge Folsom. But we really haven't talked about it as a

1 Defense group, so I don't have ability to speak for
2 everybody.

3 THE COURT: I understand that.

4 I'll just go ahead and appoint Judge Folsom, and
5 then if there is an issue, let me know. We're a ways away
6 from getting to that point anyways.

7 And then also I did see, when I looked at the
8 docket this morning before coming out to court, there was a
9 joint request to extend time for venue discovery, which
10 I'll go ahead and grant that since it's agreed.

11 And then from the Plaintiff's perspective, I think
12 I've resolved all the issues, but is there anything you
13 would like for me to take up that I haven't addressed?

14 MR. HARRIS: No, your Honor. That's all we have
15 today. Thank you.

16 THE COURT: Okay. Well, I'll get the scheduling
17 order entered. And, again, although you have to call the
18 Court regarding discovery matters, I still make myself
19 available if there are issues that come up that aren't
20 necessarily discovery related. You're welcome to reach out
21 to the Court to get some resolution or at least a
22 discussion with the Court on those issues.

23 And if there is nothing further, we'll be in
24 recess.

25 So nothing else for the Plaintiff I can do today?

1 MR. HARRIS: No, your Honor.

2 THE COURT: Anything further, Mr. Moore or
3 Ms. Smith?

4 MS. SMITH: No, your Honor. Thank you.

5 MR. MOORE: No, your Honor. Thank you.

6 THE COURT: Okay. Well, y'all have a good day,
7 and let me know if I can be of any further assistance.
8 Thank you.

9 (Proceedings concluded, 11:36 a.m.)

10 COURT REPORTER'S CERTIFICATION

11 I HEREBY CERTIFY THAT ON THIS DATE, OCTOBER 30,
12 2025, THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD
13 OF PROCEEDINGS.

14 /s/
CHRISTINA L. BICKHAM, CRR, RDR

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