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May 29, 2015

BY ECF ONLY

The Honorable Richard G. Andrews
U.S. District Court, District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

**Re: *InterDigital Communications, Inc., et al v. ZTE Corporation, et al.,*
C.A. No. 13-009-RGA**

***InterDigital Communications, Inc., et al v. Nokia Corporation, et al.,*
C.A. No. 13-010-RGA**

Dear Judge Andrews:

I write on behalf of all parties in the above-referenced related actions to request that the Court enter the parties' stipulation, being filed herewith, extending certain deadlines related to the damages/FRAND phase of the proceedings. In light of recent developments, the parties respectfully submit that it would be more efficient to modify the current schedule for this consolidated phase of the proceedings.

Specifically, as Your Honor is aware, the liability trial between InterDigital and Microsoft/Nokia, Inc. ("MMO") (C.A. No. 13-010), initially scheduled for April 2015, has been postponed until November 2015. As the parties stated when we proposed the existing schedule for damages/FRAND, "the FRAND issues overlap substantially as to ZTE and [MMO] and should be scheduled to continue in a consolidated pre-trial manner after liability of both is determined." (D.I. 470). When the current schedule was set by the Court, the Court recognized that the FRAND and damages discovery in both cases should proceed on the same schedule, due to the interplay between these issues. *See e.g.*, December 16, 2014 Tr. p. 30. Indeed, because of these interrelationships, the damages and FRAND trial dates currently on the Court's calendar are tentative, subject to further discussion at a December 15, 2015 status conference. (D.I. 474 at n. 5-6).

Under these circumstances, the parties agree that extending the damages/FRAND schedule by a few months consistent with the new schedule for the MMO liability trial will allow

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the parties to complete the damages/FRAND discovery in an efficient manner. As a result, the parties respectfully request that the Court enter the attached stipulation.

If the Court has any concerns about this scheduling extension, the parties respectfully request a teleconference or in-person status conference to address any concerns and to arrive at a schedule that makes sense for the parties and the Court.

We appreciate the Court's attention to this request and remain available at the Court's convenience.

Respectfully,

/s/ Neal C. Belgam

Neal C. Belgam No. 2721)

NCB/vkm

cc: Clerk of Court
Counsel of Record