

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

**Before the Honorable David P. Shaw  
Administrative Law Judge**

**In the Matter of:**

**CERTAIN VIDEO ANALYTICS  
SOFTWARE, SYSTEMS, COMPONENTS  
THEREOF, AND PRODUCTS  
CONTAINING SAME**

**Investigation No. 337-TA-795**

**OBJECTVIDEO, INC.'S MOTION TO COMPEL SOURCE CODE UNDER THE  
EXISTING PROTECTIVE ORDER**

Pursuant to Commission Rules 210.15, 210.26, 19 C.F.R. §§ 210.15 and 210.26, and Ground Rule 3.5, Complainant ObjectVideo, Inc. (“ObjectVideo”) respectfully requests that this Administrative Law Judge compel Respondents Robert Bosch GmbH, Bosch Security Systems, Inc., Samsung Techwin Co., Ltd., Samsung Opto-Electronics America, Sony Corporation, and Sony Electronics, Inc. (collectively “Respondents”) to produce their source code under the conditions of the existing Protective Order. In the alternative, ObjectVideo has proposed a potential amendment to the Protective Order that also adequately protects the secrecy of source code while offering flexibility to the parties for its meaningful use in this investigation. This motion is supported by a Memorandum of Points of Authorities, as well as the declaration of Julia Dayton Klein and exhibits appended thereto.

In accordance with Ground Rule 3.2, ObjectVideo certifies that more than two business days before filing this motion, it has made a reasonable, good faith effort to contact and resolve the issues with Respondents. The accompanying memorandum and exhibits set forth ObjectVideo’s efforts to meet-and-confer regarding the subject of this motion. The parties have

discussed this issue in various Discovery Committee meetings and reached an impasse on the issues during the Discovery Committee meeting on October 13, 2011, and ObjectVideo notified Respondents of its intent to file the instant motion to compel on these issues on October 14, 2011. Since that time, Respondents have still failed to produce their source code in response to ObjectVideo's requests.

Dated: October 28, 2011

Respectfully submitted,

/s/ Julia Dayton Klein

Martin R. Lueck

Julia Dayton Klein

Trevor J. Foster

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

2800 LaSalle Plaza

800 LaSalle Avenue

Minneapolis, MN 55402-2015

Telephone: (612) 349-8500

Facsimile: (612) 339-4181

mrlueck@rkmc.com

tjfoster@rkmc.com

jmdayton@rkmc.com

J. Scott Culpepper

Thomas R. DeSimone

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

One Atlantic Center

1201 West Peachtree Street

Suite 2200

Atlanta, GA 30309-3453

Telephone: (404) 760-4300

Facsimile: (404) 233 - 1267

jsculpepper@rkmc.com

trdesimone@rkmc.com

Bryan J. Vogel

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

601 Lexington Avenue

34th Floor

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

bjvogel@rkmc.com

*Counsel for Complainant ObjectVideo, Inc.*