UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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ADVANCED VIDEO TECHNOLOGIES LLC,	:
Plaintiff,	: Case No. 1:11-cv-06604 (CM) (RLE)
VS.	:
HTC CORPORATION AND HTC AMERICA, INC.,	:
Defendants.	:
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HTC CORP.'S AND HTC AMERICA, INC.'S ("HTC") NOTICE OF MOTION AND MOTION FOR A TURNOVER ORDER AGAINST GENERAL PATENT CORP., IP HOLDINGS LLC, ALEXANDER POLTORAK, AND J. NICOLAS GROSS <u>UNDER C.P.L.R. 5225(b) AND COURT'S INHERENT POWER</u>

PLEASE TAKE NOTICE THAT, under New York Civil Practice Law & Rule ("CPLR") 5225(b) and this Court's inherent authority, Defendants HTC Corporation and HTC America, Inc. (collectively "HTC") will move, and do hereby move, this Court, before the Honorable Colleen McMahon, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, for a turnover order against Plaintiff Advanced Video Technologies LLC's principals, including General Patent Corporation, IP Holdings LLC, Dr. Alexander Poltorak, and Mr. J. Nicholas Gross ("Motion").

In support of this Motion, HTC relies upon the accompanying memorandum of law, and the papers and pleadings on file in this action, and any oral arguments this Court may allow. Dated: April 24, 2019

Respectfully submitted,

COOLEY LLP

By: /s/ Kyle D. Chen

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