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

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| SECTRA COMMUNICATIONS AB,<br>Plaintiff,<br>v.<br>CISCO SYSTEMS, INC.<br>Defendant. | Civil Action No. 2:26-cv-00174-RWS<br>(LEAD CASE)<br>Jury Trial Demanded |
| SECTRA COMMUNICATIONS AB,<br>Plaintiff,<br>v.<br>FORTINET, INC.<br>Defendant. | Civil Action No. 2:26-cv-00175-RWS<br>Jury Trial Demanded |

**PLAINTIFF SECTRA COMMUNICATIONS AB'S OPPOSED MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF MOTION TO COMPEL COMPLIANCE WITH PROTECTIVE ORDER**

Plaintiff Sectra Communications AB ("Sectra") respectfully moves for leave to file a reply, not exceeding three pages, in support of its Motion to Compel Compliance with the Protective Order (ECF 42). The Court's "Standing Order Regarding 'Meet and Confer' Obligations Relating to Discovery Disputes" provides that no further briefing is allowed absent a request or an order from the Court. Sectra hereby requests further briefing in the form of a three-page reply, and respectfully offers Defendants the opportunity to file a sur-reply of equal length within three days.

Good cause exists to grant Sectra's request. Prior to filing its motion, Sectra requested a written explanation of Defendants' objections to installing certain review tools so that it could

understand the actual bases for Defendants withholding approval. Defendants refused. Accordingly, Sectra's Motion addressed all objections Defendants raised. In their response, Defendants abandoned all but one. As a result, most of Sectra's seven-page Motion addressed objections Defendants ultimately do not assert—leaving Sectra without an opportunity to fully address the arguments Defendants substantiated for the first time in their response.

Moreover, Defendants' Response raises new arguments. They argue now that because Cisco is choosing to produce source code via thin client under Paragraph 10(a), AI tools are per se incompatible with the Protective Order. ECF 45 at 2-3. This is a new objection that Defendants did not previously raise, and Sectra's proposed reply demonstrates why this is wrong. Defendants' Response also devotes pages to news headlines about AI models from Anthropic, OpenAI, and Google allegedly "breaking out" of testing environments. ECF 45 at 4-6. Sectra's proposed reply demonstrates that *every cited incident involved an AI with access to a live network*—the exact opposite of the non-networked environment required by the PO and proposed by Sectra.

Finally, granting this request will not prejudice Defendants. Sectra files its proposed reply contemporaneously with this motion, so granting leave causes no delay. To ensure complete fairness, Sectra proposes that Defendants be permitted to file a three-page sur-reply within three days.

For the foregoing reasons, Sectra respectfully requests that the Court grant this motion, permit Sectra a three-page reply, and permit Defendants to file a three-page sur-reply within three days of the date of the Court's order.

Dated: September 30, 2026

Respectfully submitted,

*/s/Carder W. Brooks*

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**COUNSEL FOR PLAINTIFF**
**SECTRA COMMUNICATIONS AB**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel on September 30, 2026.

*/s/ Carder W. Brooks*

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements in Local Rule CV-7(h), and the relief sought by this motion is opposed. The conferences required by the rule were conducted on August 31, September 11, September 15, and September 30. Edward R. Nelson III and Carder W. Brooks attended the September 15 conference for Plaintiff, and Carder W. Brooks attended the August 31, September 11, and September 30 conferences for Plaintiff. Matt Gaudet attended the September 15 conference for Defendants. David Dotson and Alice Snedeker attended the August 31, September 11, and September 30 conferences for Defendants. On the September 30 meet and confer, Sectra requested that Defendants jointly move with Sectra to request additional briefing. Defendants refused and indicated that they opposed any request from Sectra for additional briefing. No agreements could be reached on the conferences. Discussions have conclusively ended in an impasse, leaving an open issue for the court to resolve.

*/s/ Carder W. Brooks*