

1 Ryan K. Yagura (SBN 197619)
ryagura@omm.com
2 Kevin Murray (SBN 275186)
kmurray2@omm.com
3 O'MELVENY & MYERS LLP
4 400 South Hope Street
Los Angeles, CA 90071
5 Telephone: (213) 430-6189
6 Facsimile: (213) 430-6407

7 Michael J. Lennon (*pro hac vice*)
mlennon@kenyon.com
8 KENYON & KENYON LLP
One Broadway
9 New York, NY 10004
10 Telephone: (212) 425-7200
11 Facsimile: (212) 425-5288

12 Attorneys for Defendants Volkswagen
Group of America, Inc. and Bentley Motors, Inc.

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION – LOS ANGELES**

16 SIGNAL IP, INC.,
17 Plaintiff,
18 v.
19 VOLKSWAGEN GROUP OF
20 AMERICA, INC., *et al.*,
21 Defendants.

Case No. CV 14-03113 JAK(JEMx)

**NOTICE OF DEFENDANTS'
MOTION TO DISMISS THE
CLAIMS FOR WILLFUL
INFRINGEMENT IN PLAINTIFF'S
FIRST AMENDED COMPLAINT**

**THE HONORABLE JOHN A.
KRONSTADT**

**HEARING: October 20, 2014 at 8:30
AM**

JURY TRIAL DEMANDED

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NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT at 8:30 a.m. on October 20, 2014, in Courtroom 750 of the Edward R. Roybal Federal Building and United States Courthouse, located at 255 East Temple Street, Los Angeles, CA 90012-3332, the Honorable John A. Kronstadt presiding, defendants Volkswagen Group of America, Inc. and Bentley Motors, Inc. will and hereby do move the court for an order dismissing the willful infringement claims of plaintiff Signal IP, Inc. pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on July 21, 2014.

This is a motion to dismiss for failure to state a claim upon which relief can be granted, made pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. This motion is based on this Notice of Motion, the accompanying Memorandum of Points and Authorities in Support, all pleadings and other papers filed and court orders entered in the above-captioned action, and upon such other matters as may be presented to or considered by the court.

1 Dated: July 28, 2014

Respectfully submitted,

2 Ryan K. Yagura (SBN 197619)
3 *ryagura@omm.com*

4 Kevin Murray (SBN 275186)
5 *kmurray2@omm.com*

6 O'MELVENY & MYERS LLP
7 400 South Hope Street
8 Los Angeles, CA 90071
9 Telephone: (213) 430-6189
10 Facsimile: (213) 430-6407

11 Michael J. Lennon (*pro hac vice*)
12 *mlennon@kenyon.com*

13 KENYON & KENYON LLP
14 One Broadway
15 New York, NY 10004
16 Telephone: (212) 425-7200
17 Facsimile: (212) 425-5288

18 Michael N. Zachary (SBN 112749)
19 *mzachary@kenyon.com*

20 KENYON & KENYON LLP
21 1801 Page Mill Road
22 Palo Alto, CA 94304
23 Telephone: (650) 384-4683
24 Facsimile: (650) 384-4701

25 Susan A. Smith (SBN 224894)
26 *ssmith@kenyon.com*

27 KENYON & KENYON LLP
28 1500 K Street, NW, Suite 700
Washington, DC 20005
Telephone: (202) 220-4321
Facsimile: (202) 220-4201

By: /s/ Ryan K. Yagura
Ryan K. Yagura

Attorneys for Defendants Volkswagen
Group of America, Inc. and Bentley
Motors, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send notification of such filing to all attorneys of record who have consented to service via CM/ECF.

/s/ Ryan K. Yagura
Ryan K. Yagura