EXHIBIT 2

From: Torchia, Paul E.

Sent: Wednesday, September 11, 2019 4:06 PM

To: Jacobs, Aaron

Cc: Foster, James J.; uniloc; Rho, Jennifer; Robb, Andrew; Gannon,

Kevin; Ercolini, Michael

Subject: RE: Uniloc v. Infor 8:19-cv-01150 (CDCA)

Aaron-

Thanks for the call.

On the call, I reiterated our view, expressed in the letter, that Uniloc has not made a plausible pleading of infringement, and that the Complaint if anything demonstrates that there is no infringement. I pointed out that Judge Staton's rules require us to discuss whether Uniloc believed the issues we raised could be cured by amendment, and asked you for Uniloc's views on that.

You stated that Uniloc believes that the pleading is adequate at that further detail should come after discovery. You stated Uniloc would oppose our motion, and we agreed that we are at an impasse.

Best regards,

Paul

Paul E. Torchia

GIBSON DUNN

Gibson, Dunn & Crutcher LLP 200 Park Avenue, New York, NY 10166-0193 Tel +1 212.351.3953 • Fax +1 212.351.6352 PTorchia@gibsondunn.com • www.gibsondunn.com

From: Jacobs, Aaron <ajacobs@princelobel.com> Sent: Wednesday, September 11, 2019 9:50 AM To: Torchia, Paul E. <PTorchia@gibsondunn.com>

Cc: Foster, James J. <ifoster@princelobel.com>; uniloc <uniloc@princelobel.com>; Rho, Jennifer

<JRho@gibsondunn.com>; Robb, Andrew <ARobb@gibsondunn.com>; Gannon, Kevin

<kgannon@princelobel.com>; Ercolini, Michael <mercolini@princelobel.com>

Subject: RE: Uniloc v. Infor 8:19-cv-01150 (CDCA)

[External Email]

Paul.



That works. Please let me know what number to call.

Aaron

From: Torchia, Paul E. [mailto:PTorchia@gibsondunn.com]

Sent: Wednesday, September 11, 2019 9:47 AM **To:** Jacobs, Aaron ajacobs@princelobel.com

Cc: Foster, James J. <jfoster@princelobel.com>; uniloc <uniloc@princelobel.com>; Rho, Jennifer

<<u>JRho@gibsondunn.com</u>>; Robb, Andrew <<u>ARobb@gibsondunn.com</u>>; Gannon, Kevin

<kgannon@princelobel.com>; Ercolini, Michael <mercolini@princelobel.com>

Subject: Re: Uniloc v. Infor 8:19-cv-01150 (CDCA)

Thanks for the response Aaron. Let's speak at 3:30 PM Eastern.

Paul

On Sep 10, 2019, at 7:57 PM, Jacobs, Aaron <ajacobs@princelobel.com> wrote:

[External Email]

Paul,

I'm clear tomorrow other than from 11:00 to 12:00. Please let me know what works for you.

Sincerely yours,

Aaron

From: Torchia, Paul E. [mailto:PTorchia@gibsondunn.com]

Sent: Tuesday, September 10, 2019 6:07 PM

To: Jacobs, Aaron ajacobs@princelobel.com">; Foster, James J.

<ifoster@princelobel.com>

Cc: uniloc <<u>uniloc@princelobel.com</u>>; Rho, Jennifer <<u>JRho@gibsondunn.com</u>>; Robb, Andrew <<u>ARobb@gibsondunn.com</u>>; Gannon, Kevin <<u>kgannon@princelobel.com</u>>; Ercolini, Michael <<u>mercolini@princelobel.com</u>>

Subject: RE: Uniloc v. Infor 8:19-cv-01150 (CDCA)

Aaron and James-

Writing to follow up on the letter below. Judge Staton's standing order and the local rules require that we meet and confer by Thursday of this week on our Rule 12 motion (i.e., 7 days before it is due).

Please let me know if there is a time you are available for a call either tomorrow or Thursday.

Paul



Paul E. Torchia

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From: Torchia, Paul E.

Sent: Thursday, September 5, 2019 4:04 PM

To: 'ajacobs@princelobel.com' <ajacobs@princelobel.com>

Cc: uniloc <<u>uniloc@princelobel.com</u>>; Rho, Jennifer <<u>JRho@gibsondunn.com</u>>; Robb, Andrew <<u>ARobb@gibsondunn.com</u>>; Gannon, Kevin <<u>kgannon@princelobel.com</u>>;

'Ercolini, Michael' < mercolini@princelobel.com >; 'Foster, James J.'

<jfoster@princelobel.com>

Subject: Uniloc v. Infor 8:19-cv-01150 (CDCA)

Aaron-

Please see the attached letter.

Best regards,

Paul

Paul E. Torchia

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Gibson, Dunn & Crutcher LLP 200 Park Avenue, New York, NY 10166-0193 Tel +1 212.351.3953 • Fax +1 212.351.6352 PTorchia@gibsondunn.com • www.gibsondunn.com

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