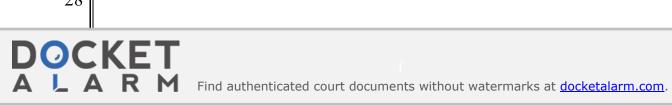
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15	Attorneys for Defendant Infor, Inc.	
16		AC DICTRICT COLLDT
17	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA SOUTHERN DIVISION	
18		
19	UNILOC 2017 LLC,	
20	Plaintiff,	CASE NO. 8:19-cv-01150-JLS-ADS
21	V.	DECLARATION OF PAUL E.
22	INFOR, INC.,	TORCHIA IN SUPPORT OF DEFENDANT INFOR, INC.'S
23	Defendants.	RENEWED MOTION TO
24		DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6)
25		AND MOTION TO STAY
26		
27		
28		



I, Paul E. Torchia, hereby declare and state:

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1. I am Partner at the law firm of Gibson, Dunn & Crutcher LLP, attorneys for Defendant Infor, Inc. ("Infor") in the above titled action. I am a member in good standing of the bar of the State of New York and am admitted to practice before this

5

Court pro hac vice. I make this declaration on my own knowledge.

6

2. Attached as **Exhibit 1** is a true and correct copy of Appellants Uniloc Luxembourg S.A. and Uniloc USA, Inc.'s Opening Brief filed in *Uniloc USA*, *Inc. v*.

8

7

ADP, LLC, No. 18-1132, D.I. 53 (Fed. Cir. Aug. 22, 2018).

printed on October 29, 2019 from the following URL:

9

3. Attached as **Exhibit 2** is a true and correct copy of Appellants Uniloc Luxembourg S.A. and Uniloc USA, Inc.'s Corrected Reply Brief filed in *Uniloc USA*,

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10

Inc. v. ADP, LLC, No. 18-1132, D.I. 67 (Fed. Cir. Oct. 30, 2018).

12

4. Attached as **Exhibit 3** is a true and correct copy of a webpage titled "Infor

13

To Acquire Workbrain for \$227 Million," dated April 5, 2007. The webpage was

14

https://www.industryweek.com/information-technology/infor-acquire-workbrain-227-

16

15

....

6 million.

17

5. Attached as **Exhibit 4** is a true and correct copy of a webpage titled "Infor Enters Cloud CRM Market with Agreement to Acquire Saleslogix," dated August 14,

18

2014. The webpage was printed on October 29, 2019 from the following URL:

19

https://www.infor.com/news/infor-enters-cloud-crm-market-with-agreement-to-

2021

acquire-saleslogix.

22

6. Attached as **Exhibit 5** is a true and correct copy of a webpage titled "IBM

23

Simplifies Web Application Management," dated October 7, 1998. The webpage was

24

https://www-03.ibm.com/press/us/en/pressrelease/2433.wss.

printed on October 29, 2019 from the following URL:

2526

7. Counsel for Uniloc and I conferred over the telephone on October 15,

27

2019, regarding Infor's intent to file its renewed motion to dismiss. On that call, I also

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proposed that the parties find a way maintain the status quo and have the renewed



1	motion to dismiss heard on the same day as the scheduling conference, either by	
2	proposing to move the scheduling conference out to the hearing date of the renewed	
3	motion, accelerating the briefing schedule in an effort to keep the earlier scheduling	
4	conference date, or some combination of the two. Counsel for Uniloc declined Infor's	
5	proposals and stated that it would oppose Infor's motion to dismiss. Attached as	
6	Exhibit 6 is a true and correct copy of the email chain, beginning on October 14 and	
7	ending on October 15, between myself and counsel for Uniloc regarding these	
8	discussions.	
9	8. On October 18, 2019, in connection with the parties Rule 26(f)	
10	conference, I conferred with counsel for Uniloc about Infor's intent to file its motion to	
11	stay discovery pending the ruling on Infor's motion to dismiss. Counsel for Uniloc	
12	stated it would oppose that motion as well.	
13		
14	I declare under penalty of perjury pursuant to the laws of the United States of	
15	America and the State of California that the foregoing is true and correct.	

America and the State of California that the foregoing is true and correct.

Executed at New York, New York , on this 31 day of October, 2019.

/s/ Paul E. Torchia
Paul E. Torchia