

1 Arpita Bhattacharyya (SBN: 316454)  
arpita.bhattacharyya@finnegan.com  
2 **FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP**  
3 3300 Hillview Avenue  
Palo Alto, California 94304  
4 Telephone: (650) 849-6600  
Facsimile: (650) 849-6666

5 *\*additional attorneys listed in signature block*  
6

7 *Attorneys for Defendants Lenovo (United States) Inc.  
and Motorola Mobility LLC*  
8  
9

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**  
13

14 NEODRON LTD.,

15 Plaintiff,

16 v.

17 LENOVO GROUP LTD., LENOVO  
18 (UNITED STATES) INC., AND  
MOTOROLA MOBILITY LLC.,

19 Defendants.  
20

CASE NO. 3:19-cv-05644-SI

**DEFENDANTS LENOVO (UNITED  
STATES) INC. AND MOTOROLA  
MOBILITY LLC'S NOTICE OF  
SUPPLEMENTAL AUTHORITY  
CONCERNING MOTION TO STAY (DKT.  
NO. 92)**

1 Defendants Lenovo (United States) Inc. (“Lenovo”) and Motorola Mobility LLC respectfully  
 2 submit this Notice of Supplemental Authority concerning their Motion to Stay Pending *Inter Partes*  
 3 Review. On August 20, 2020, the Patent Trial and Appeal Board of the U.S. Patent and Trademark  
 4 Office issued a decision granting *inter partes* review of claims 1–17 of U.S. Patent No. 10,088,960  
 5 (the “’960 patent”). *Microsoft Corp. et al. v. Neodron Ltd.*, IPR2020-00469, Paper 9 (P.T.A.B. Aug.  
 6 20, 2020). A true and correct copy of the Board’s Decision Granting Institution of *Inter Partes*  
 7 Review is submitted hereto as Exhibit A. Claims 9–14 of the ’960 patent are currently asserted  
 8 against Lenovo.

9 Additionally, on July 29, 2020, Apple Inc. filed a petition for *inter partes* review of claims 1–  
 10 24 of U.S. Patent No. 7,821,502 (the “’502 patent”), asserting a different set of grounds from the  
 11 *inter partes* review petition submitted by Lenovo. *Apple Inc. v. Neodron Ltd.*, IPR2020-01331, Paper  
 12 2 (P.T.A.B. July 29, 2020). Claims 1, 5, and 12 of the ’502 patent are currently asserted against  
 13 Lenovo.

14  
 15 Dated: August 21, 2020

Respectfully submitted,

16 By: /s/ Aliza George Carrano

17 Arpita Bhattacharyya (SBN: 316454)  
 arpita.bhattacharyya@finnegan.com  
 18 **FINNEGAN, HENDERSON, FARABOW,**  
**GARRETT & DUNNER, LLP**  
 19 3300 Hillview Avenue  
 Palo Alto, California 94304  
 Telephone: (650) 849-6600  
 Facsimile: (650) 849-6666

20  
 21 Cecilia Sanabria (*pro hac vice*)  
 cecilia.sanabria@finnegan.com  
 22 Aliza George Carrano (*pro hac vice*)  
 aliza.carrano@finnegan.com  
 23 Christopher T. Blackford (*pro hac vice*)  
 christopher.blackford@finnegan.com  
 24 Elizabeth A. Niemeyer (*pro hac vice* to be filed)  
 elizabeth.niemeyer@finnegan.com  
 25 Smith R. Brittingham (*pro hac vice* to be filed)  
 smith.brittingham@finnegan.com  
 26 Kelly C. Lu (SBN 303097)  
 kelly.lu@finnegan.com  
 27 Philip J. Eklem (*pro hac vice*)  
 philip.eklem@finnegan.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Amanda E. Stephenson (*pro hac vice*)  
amanda.stephenson@finnegan.com  
**FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP**  
901 New York Avenue, NW  
Washington, DC 20001-4413  
Telephone: (202) 408-4000  
Facsimile: (202) 408-4400

Lionel M. Lavenue (*pro hac vice*)  
lionel.lavenue@finnegan.com  
**FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP**  
Two Freedom Square  
11955 Freedom Drive  
Reston, Virginia 20190  
Telephone: (571) 203-2700  
Facsimile: (571) 203-2777

Robert High (*pro hac vice*)  
robert.high@finnegan.com  
**FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP**  
271 17th Street, NW  
Suite 1400  
Atlanta, GA 30363-6209  
Telephone: (404) 653-6400  
Facsimile: (404) 653-6444

*Attorneys for Defendants Lenovo (United States)  
Inc. and Motorola Mobility LLC*