

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-919-LPS
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	
<hr/>		
ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-920-LPS
	)	
OATH HOLDINGS INC. and	)	
OATH INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS GOOGLE LLC’S, OATH HOLDINGS INC.’S AND  
OATH INC.’S OPENING CLAIM CONSTRUCTION BRIEF REGARDING CLAIM  
TERMS PARTICULAR TO U.S. PATENT NO. 7,496,854**

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Defendants Google LLC (“Google”), Oath Holdings Inc., and Oath Inc. (together “Oath”) file their initial brief on claim construction regarding elements particular to U.S. Patent No. 7,496,854 (“the ’854 patent”). Arendi continues to assert claims from the ’854 Patent despite the fact that the U.S. Patent Trial and Appeals Board (“PTAB”) already expressly has found all of the asserted means-plus-function claim elements to be indefinite.

## I. INTRODUCTION

### A. The Asserted Patents

There are four patents at issue in the captioned cases: the ’854 Patent, U.S. Patent No. 7,921,356 (“the ’356 Patent”), U.S. Patent No. 7,917,843 (“the ’843 patent”) and U.S. Patent No. 8,306,993 (“the ’993 Patent”). The ’843 and ’993 Patents are asserted against all Defendants, while the ’854 and ’356 Patents are asserted only against defendants Google and/or Oath.<sup>1</sup> This brief addresses only disputed claim terms that appear exclusively in the ’854 Patent. The ’854, ’356 and ’843 Patents share a common specification and are in the same line of continuation patents originating from a common filing on November 10, 1998.<sup>2</sup> The patents thus expired on November 10, 2018.

The ’854, ’356, and ’843 Patents generally describe a computer-implemented approach for allowing a user to insert contact information from one “application program” (*i.e.*, a contact management program) into a document in a different “application program” (*i.e.*, a word processor), and vice versa. The patents describe the problem being addressed as follows:

In recent years, with the advent of programs, such as word processors, spreadsheets, etc. (hereinafter called “word processors”) users may require retrieval of information, such as name and address information, etc., for insertion into a document, such as a letter, fax, etc., created with the word processor. Typically, the information is retrieved by the user

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<sup>1</sup> Oath joins this brief as to ’854 claims 31 and 79, which are asserted against Oath.

<sup>2</sup> The parties agree that for terms appearing in the ’843 and/or ’993 Patents, as well as in the ’854 or ’356 Patents, a single, common construction across all patents was intended and is correct.

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