

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                                   |             |   |                      |
|-----------------------------------|-------------|---|----------------------|
| <hr/>                             |             | ) |                      |
| ARENDI S.A.R.L.,                  |             | ) |                      |
|                                   | Plaintiff,  | ) |                      |
|                                   |             | ) |                      |
| v.                                |             | ) | C.A. No. 12-1595-LPS |
|                                   |             | ) |                      |
| LG ELECTRONICS, INC.,             |             | ) |                      |
| LG ELECTRONICS USA, INC. and      |             | ) |                      |
| LG ELECTRONICS MOBILECOMM U.S.A., |             | ) |                      |
| INC.,                             |             | ) |                      |
|                                   | Defendants. | ) |                      |
| <hr/>                             |             | ) |                      |
| ARENDI S.A.R.L.,                  |             | ) |                      |
|                                   | Plaintiff,  | ) |                      |
|                                   |             | ) |                      |
| v.                                |             | ) | C.A. No. 12-1596-LPS |
|                                   |             | ) |                      |
| APPLE INC.,                       |             | ) |                      |
|                                   | Defendant.  | ) |                      |
| <hr/>                             |             | ) |                      |
| ARENDI S.A.R.L.,                  |             | ) |                      |
|                                   | Plaintiff,  | ) |                      |
|                                   |             | ) |                      |
| v.                                |             | ) | C.A. No. 12-1599-LPS |
|                                   |             | ) |                      |
| MICROSOFT MOBILE, INC.,           |             | ) |                      |
|                                   | Defendants. | ) |                      |
| <hr/>                             |             | ) |                      |
| ARENDI S.A.R.L.,                  |             | ) |                      |
|                                   | Plaintiff,  | ) |                      |
|                                   |             | ) |                      |
| v.                                |             | ) | C.A. No. 12-1601-LPS |
|                                   |             | ) |                      |
| MOTOROLA MOBILITY LLC             |             | ) |                      |
| f/k/a MOTOROLA MOBILITY, INC.,    |             | ) |                      |
|                                   | Defendant.  | ) |                      |
| <hr/>                             |             | ) |                      |

|                                   |   |                      |
|-----------------------------------|---|----------------------|
| ARENDI S.A.R.L.,                  | ) |                      |
|                                   | ) |                      |
| Plaintiff,                        | ) |                      |
|                                   | ) |                      |
| v.                                | ) | C.A. No. 12-1602-LPS |
|                                   | ) |                      |
| SONY MOBILE COMMUNICATIONS (USA)  | ) |                      |
| INC., f/k/a SONY ERICSSON MOBILE  | ) |                      |
| COMMUNICATIONS (USA) INC.,        | ) |                      |
| SONY CORPORATION and              | ) |                      |
| SONY CORPORATION OF AMERICA,      | ) |                      |
|                                   | ) |                      |
| Defendants.                       | ) |                      |
| <hr/>                             |   |                      |
| 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.                       | ) |                      |
| <hr/>                             |   |                      |

**DEFENDANTS’ MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 12(c), Defendants LG Electronics, Inc., LG Electronics USA, Inc., LG Electronics Mobilecomm U.S.A., Inc., Apple Inc., Microsoft Mobile, Inc., Motorola Mobility LLC, f/k/a Motorola Mobility, Inc., Sony Mobile Communications (USA) Inc., f/k/a Sony Ericsson Mobile Communications (USA) Inc., Sony Corporation, Sony

Corporation of America, Google LLC, Oath Holdings Inc. and Oath Inc. (collectively, “Defendants”) hereby move the Court for entry of judgment on the pleadings in Defendants’ favor, holding that all claims asserted by Plaintiff Arendi S.A.R.L. are invalid under 35 U.S.C. § 101 as directed to patent-ineligible subject matter.

The grounds for this motion are set forth in Defendants’ opening brief filed herewith.

FISH & RICHARDSON, P.C.

DLA PIPER LLP

/s/ Jeremy D. Anderson

Jeremy D. Anderson (No. 4515)  
222 Delaware Avenue, 17th Floor  
P.O. Box 1114  
Wilmington, DE 19899-1114  
janderson@fr.com

*Attorney for Defendants LG Electronics, Inc., LG Electronics USA, Inc. and LG Electronics Mobilecomm U.S.A., Inc.*

/s/ Denise S. Kraft

Denise S. Kraft (No. 2778)  
Brian A. Biggs (No. 5591)  
Erin E. Larson (No. 6616)  
1201 North Market Street, Suite 2100  
Wilmington, DE 19801-3046  
Denise.kraft@dlapaper.com  
Brian.biggs@dlapiper.com  
erin.larson@dlapiper.com

*Attorneys for Defendant Apple Inc.*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

POTTER ANDERSON & CORROON LLP

/s/ Jeremy A. Tigan

Jack B. Blumenfeld (No. 1014)  
Jeremy A. Tigan (No. 5239)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
jblumenfeld@mnat.com  
jtigan@mnat.com

*Attorneys for Defendant Microsoft Mobile Inc.*

/s/ David E. Moore

David E. Moore (No. 3983)  
Bindu A. Palapura (No. 5370)  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
Wilmington, DE 19801  
dmoore@potteranderson.com  
bpalapura@potteranderson.com

*Attorneys for Defendant Motorola Mobility LLC, f/k/a Motorola Mobility, Inc., and Defendant Google LLC*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith, II

Rodger D. Smith, II (No. 3778)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
rsmith@mnat.com

*Attorneys for Defendants Sony Mobile  
Communications (USA) Inc., Sony  
Corporation and Sony Corporation of  
America*

July 2, 2019

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (No. 1014)  
Anthony D. Raucci (No. 5948)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
jblumenfeld@mnat.com  
araucci@mnat.com

*Attorneys for Defendants Oath Holdings Inc.  
and Oath Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 2, 2019, upon the following in the manner indicated:

Neal C. Belgam, Esquire  
Eve H. Ormerod, Esquire  
SMITH, KATZENSTEIN & JENKINS, LLP  
800 Delaware Avenue, Suite 1000  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

John P. Lahad, Esquire  
SUSMAN GODFREY LLP  
100 Louisiana Street, Suite 5100  
Houston, TX 77002  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Stephen D. Susman, Esquire  
Seth Ard, Esquire  
Max I. Straus, Esquire  
SUSMAN GODFREY LLP  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

*/s/ Jeremy A. Tigan*

---

Jeremy A. Tigan (#5239)