

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

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.)	

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1596-LPS
)	
APPLE INC.,)	
)	
Defendant.)	

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1597-LPS
)	
BLACKBERRY LIMITED and)	
BLACKBERRY CORPORATION,)	
)	
Defendants.)	

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1599-LPS
)	
MICROSOFT MOBILE, INC.,)	
)	
Defendants.)	

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

MOTOROLA MOBILITY LLC)

f/k/a MOTOROLA MOBILITY, INC.,)

Defendant.)

C.A. No. 12-1601-LPS

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

SONY MOBILE COMMUNICATIONS (USA))

INC., f/k/a SONY ERICSSON MOBILE)

COMMUNICATIONS (USA) INC.,)

SONY CORPORATION and)

SONY CORPORATION OF AMERICA,)

Defendants.)

C.A. No. 12-1602-LPS

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

GOOGLE LLC,)

Defendant.)

C.A. No. 13-919-LPS

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

OATH HOLDINGS INC. and)

OATH INC.,)

Defendants.)

C.A. No. 13-920-LPS

**DEFENDANTS' COMMENTS REGARDING
PLAINTIFF'S TECHNOLOGY TUTORIAL**

Defendants provide the following two comments regarding the technology tutorial submitted by Plaintiff Arendi S.A.R.L. (“Arendi”) on June 19, 2019.

First, Defendants submit that the initial portion of Arendi’s video (from 0:24 to 1:45) is irrelevant. Rather than provide the Court with context for understanding the technology disclosed in the patents, this portion of Arendi’s video instead describes the supposed history of Arendi’s business, the named inventor Atle Hedloy, and Arendi’s supposed licensing revenues. Because these descriptions are irrelevant to the technology disclosed in the patents, Defendants respectfully request that the Court disregard the initial portion of Arendi’s video from 0:24 to 1:45.¹

Second, Defendants submit that the final portion of Arendi’s video (from 7:04 to 9:24) is both inappropriate and argumentative. This portion of Arendi’s video presents Arendi’s disputed infringement allegations as supposed descriptions of the patents-in-suit. In fact, the alleged “Real World Example” presented in Arendi’s video – which purports to show automated analysis and identification (on a smartphone) of text in a mobile text message relating to flight information – has no basis in the patents-in-suit whatsoever. The patent specifications do not describe, or even hint at, embodiments involving the (a) the identification of flight number information, (b) the analysis of information in mobile text messages, or (c) the use of a smartphone. Moreover, there are numerous, significant, and material differences between Arendi’s suggested “Real World Example” and what is claimed by the patents.

¹ Defendants have no comments regarding the portion of Arendi’s technology tutorial video from 1:46 to 7:03, which describes the patents-in-suit with direct quotations from the patent specifications and references to the patent figures. This portion of Arendi’s technology tutorial largely tracks the description of the patents-in-suit in Defendants’ technology tutorial.

The purpose of the technology tutorial is to provide the Court with context for understanding the technology disclosed in the patent. The suggested “Real World Example” in Arendi’s tutorial violates this purpose by previewing and advancing Arendi’s infringement arguments rather than discussing technology actually disclosed in Arendi’s patents. Because Arendi’s technology tutorial, starting at 7:04, gives examples that have no basis in the patents themselves and constitute inappropriate argument, Defendants respectfully request that the Court disregard this portion of Arendi’s technology tutorial.

Dated: July 17, 2019

Respectfully submitted,

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