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July 25, 2019

The Honorable Leonard P. Stark
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26 Room 6124
Wilmington, DE 19801-3555

**Re:**   *Arendi S.A.R.L. v. LG Elecs., Inc., et. al.*, **C.A. No. 12-1595-LPS**
*Arendi S.A.R.L. v. Apple Inc.,* **C.A. No. 12-1596-LPS**
*Arendi S.A.R.L. v. Blackberry Ltd., et. al.*, **C.A. No. 12-1597-LPS**
*Arendi S.A.R.L. v. Microsoft Mobile, Inc.,* **C.A. No. 12-1599-LPS**
*Arendi S.A.R.L. v. Motorola Mobility LLC, et. al.*, **C.A. No. 12-1601-LPS**
*Arendi S.A.R.L. v. Sony Mobile Commc'ns (USA) Inc., et. al.*, **C.A. No. 12-1602-LPS**
*Arendi S.A.R.L. v. Google LLC*, **C.A. No. 13-919-LPS**
*Arendi S.A.R.L. v. Oath Holdings Inc., et. al.*, **C.A. No. 13-920-LPS**

Dear Chief Judge Stark:

We represent Defendant Apple Inc. in the above-referenced cases and write on behalf of all parties regarding the claim construction hearing scheduled for July 26, 2019.  Subject to the Court's approval, the parties jointly propose that the parties proceed term-by-term on the disputed claim terms in U.S. Patent Nos. 7,917,843 and 8,306,993 as follows:

**U.S. Patent Nos. 7,917,843 and 8,306,993**
1.     "document"
2.     "first information"
3.     "computer program" / "first computer program" / "second computer program"
4.     "to determine if the first information is at least one of a plurality of types of information that can be searched for"
5.     "wherein the computer implemented method is configured to perform each of action (i), action (ii), and action (iii) using the first contact information previously identified as a result of the analyzing"
6.     "providing for the user an input device configured so that a single execute command from the input device is sufficient to cause the performing"
7.     "that allows a user to enter a user command to initiate an operation"
8.     "providing an input device configured by the first computer program" / "providing an input device configured by the document editing program"
9.     "while it is electronically displayed"

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July 25, 2019
Page Two

Further, Arendi S.A.R.L. and Google LLC would like to reserve 35-40 minutes at the end of the hearing to address disputed terms specific to U.S. Patent No. 7,496,854.  The parties jointly propose that the parties proceed term-by-term on the disputed terms specific to U.S. Patent No. 7,496,854 as follows:

    **U.S. Patent No. 7,496,854**
1. "first application program" and "second application program"
2. "means for marking without user intervention the first information to alert the user that the first information can be utilized in a second application program"
3. "means for identifying without user intervention or designation the first information"
4. "inserting a second information into the document"
5. "performing an operation related to second information"
6. "initializing the second application program."

The parties are available should the Court have any questions.

Respectfully submitted,

**DLA Piper LLP (US)**

*/s/ Denise S. Kraft*
Denise S. Kraft (DE Bar No. 2778)

DSK:

cc: All counsel for the parties (via Electronic Mail)