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VIA ELECTRONIC-FILING

The Honorable Leonard P. Stark
The United States District Court
for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: *Arendi S.A.R.L. v. LG Electronics, 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 Limited, et al., C.A. No. 12-1597-LPS
Arendi S.A.R.L. v. Motorola Mobility LLC, 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:

Defendants write in response to Plaintiff Arendi S.A.R.L.'s ("Arendi") request that the Court now schedule trial dates in the above actions. The parties previously agreed on, and stipulated to, a case schedule that set the conference for ordering and scheduling of trials after briefing on dispositive motions is complete. In June 2020, the parties filed a Joint Stipulation and [Proposed] Order For Extension of Certain Case Deadlines that confirmed the agreement that the conference for ordering and scheduling of trials should occur after completion of dispositive motion briefing. *See* Case 1:13-cv-00919, D.I. 210; June 5, 2020 Docket Text Order. The case schedule agreed to and proposed in the June 2020 Joint Stipulation, and adopted by the Court, was made with full knowledge and understanding of the "COVID-19 pandemic and its effect on the Court's trial docket" - the circumstance that Arendi invokes in its letter as a basis for the immediate request to schedule trial dates. Arendi's letter fails to remind the Court that its current request runs counter to the stipulated schedule for trial scheduling.

Arendi has not shown the required "good cause" to modify the stipulated schedule for the ordering and scheduling of trials, and none exists. The parties stipulated to setting the trial scheduling conference only after dispositive motions precisely because it is difficult, if not impossible, to determine (a) which of the seven separate cases involved are likely to go to trial, and on which issues; (b) the likely time required for each trial; and (c) the most efficient and practical ordering of the seven separate trials, until dispositive motions are fully briefed and can be evaluated by the parties and the Court. In fact, given that the parties currently are in the middle of expert discovery, setting trial order and schedules now makes no sense and begs for later alteration once summary judgment and Daubert motions are filed and ruled upon.

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Because Arendi offers no justification for modifying the stipulated case schedule at this time, the Court should maintain the existing schedule, as previously ordered, and should deny Arendi's request immediately to schedule trial dates.

Respectfully,

/s/ David E. Moore

David E. Moore

DEM:nmt/6923287/40549

cc: Counsel of record (*via electronic mail*)