

SMITH KATZENSTEIN JENKINS LLP

November 4, 2020

VIA E-FILING

The Honorable Leonard P. Stark
J. Caleb Boggs Federal Building
844 N. King Street
Room 6124, Unit 26
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. 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:

Plaintiff Arendi responds to Defendants' joint letter (C.A. No. 12-1595-LPS, D.I. 220). Defendants are incorrect that the parties agreed to "set the conference for ordering and scheduling of trials after briefing on dispositive motions is complete." Not surprisingly, the scheduling order says nothing of the sort. Rather, the order simply states that the conference will occur at a date "to be determined" and the entry for that item happens to be listed after the last deadline for dispositive motion briefing.

In any event, these cases have been pending for nearly eight years, and there is no reason to delay entry of a trial date. Defendants' complaints do not justify deferring the issue. First, trial dates are routinely set after cases are filed without regard to the issues remaining after dispositive motions. Second, Arendi has provided to Defendants, at their request, a proposed ordering of cases starting with a week-long trial against Apple in the fall of 2021 and then week-long trials every four weeks thereafter, with the Google trial second. Third, Defendants will not suffer any prejudice by setting trial dates. By contrast, Arendi falls further behind in the queue for a trial date, which is only getting longer given the current circumstances.

For the above reasons, Arendi respectfully requests that the Court set these cases for trial, starting in the fall 2021.

Arendi remains available at the Court's convenience should Your Honor have any questions or wish to discuss.

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Respectfully submitted,

/s/ Eve H. Ormerod

Eve H. Ormerod (#5369)

cc: All Counsel of Record (*via* CM/ECF)
Clerk of Court (*via* CM/ECF)