

**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.)	
<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. 12-1597-LPS
)	
BLACKBERRY LIMITED and)	
BLACKBERRY CORPORATION,)	
)	
Defendants.)	
<hr/>		

**DEFENDANTS' MOTION TO STRIKE PORTIONS OF
DR. EARL SACERDOTI'S REPORT REGARDING VALIDITY**

Pursuant to Federal Rule of Civil Procedure 37(c)(1), Defendants LG Electronics, Inc., LG Electronics USA, Inc., LG Electronics Mobilecomm U.S.A., Inc., Apple Inc., BlackBerry Limited, BlackBerry Corporation, 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 to strike portions of Arendi expert Dr. Sacerdoti's Responsive Report Regarding the Validity of U.S. Patent No. 7,917,843 that suggest, rely upon, or opine on, the previously unidentified conception date of July 6, 1997 for the asserted '843 Patent.

The grounds for this motion are set forth in the Defendants' letter brief filed herewith in accordance with the Court's procedures for filing a motion to strike.

Pursuant to D. Del. L.R. 7.1.1, the parties conferred and Arendi will oppose the motion.

Respectfully submitted,

OF COUNSEL:

Steven R. Katz
Jacob B. Pecht
FISH & RICHARDSON, P.C.
One Marina Park Drive
Boston, MA 02210
Tel: (617) 5542-5070
katz@fr.com
pecht@fr.com

R. Andrew Schwentker
FISH & RICHARDSON, P.C.
1000 Maine Avenue, S.W. Suite 1000
Washington, DC 20024
Tel: (202) 783-5070
schwentker@fr.com

OF COUNSEL:

Mark D. Fowler
Christine K. Corbett
Summer Torrez
DLA PIPER LLP (US)
2000 University Avenue
East Palo Alto, CA 94303-2215
Tel: (650) 833-2000
mark.fowler@dlapiper.com
christine.corbett@dlapiper.com
summer.torrez@dlapiper.com

Robert C. Williams
Kevin C. Hamilton
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Tel: (619) 699-2700
robert.williams@dlapiper.com
kevin.hamilton@dlapiper.com

FISH & RICHARDSON, P.C.

By: /s/ Jeremy D. Anderson
Jeremy D. Anderson (#4515)
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899-1114
Tel: (302) 652-5000
janderson@fr.com

*Attorneys for Defendants LG Electronics, Inc.,
LG Electronics USA, Inc. and LG Electronics
MobileComm U.S.A., Inc.*

DLA PIPER LLP (US)

By: /s/ Brian A. Biggs
Brian A. Biggs (#5591)
Erin E. Larson (#6616)
919 N. Market Street, Suite 1500
Wilmington, DE 19801
Tel: (302) 468-5645
brian.biggs@dlapiper.com
erin.larson@dlapiper.com

Attorneys for Defendant Apple Inc.

OF COUNSEL:

Brian C. Riopelle
David E. Finkelson
MCGUIREWOODS LLP
One James Center
901 E. Cary Street
Richmond, VA 23219
Tel: (804) 775-1000
briopelle@mcguirewoods.com
dfinkelson@mcguirewoods.com

Rachelle Thompson
MCGUIREWOODS LLP
434 Fayetteville Street, Suite 2600
Raleigh, NC 27601
Tel: (919) 755-6600
rthompson@mcguirewoods.com

Jason W. Cook
MCGUIREWOODS LLP
2000 McKinney Avenue, Suite 1400
Dallas, TX 75201
Tel: (214) 932-6400
jcook@mcguirewoods.com

MORRIS JAMES LLP

By: /s/ Kenneth L. Dornsey
Kenneth L. Dornsey (#3726)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Tel: (302) 888-6800
kdorsney@morrisjames.com

*Attorneys for Defendants BlackBerry Limited
and BlackBerry Corporation*

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.