

# EXHIBIT A

**REDACTED IN ITS  
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# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L.,

Plaintiff,

v.

GOOGLE, INC.,

Defendant.

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C.A. No. 1:13-cv-00919-LPS

JURY TRIAL DEMANDED

**ARENDI'S SECTION 4(A) DISCLOSURES**

In accordance with the Court's Scheduling Order, Arendi makes the following disclosures to Defendant GOOGLE, INC. (hereafter "Defendant"). Arendi reserves the right to supplement, amend or correct these disclosures if necessary in the future for any reason.

The '854 Accused Products, as defined herein, infringe the following asserted patents: U.S. Patents Nos. 7,496,854; 7,917,843. The '854 Accused Products include each of Defendants' mobile devices, that have the capacity to send or receive email, and that are both (1) on or after February 24, 2009, made, used, imported, offered for sale, or sold in the United States and (2) not covered by the license with Microsoft dated November 28, 2011. The '853 Accused Products infringe the following asserted patent: U.S. Patent No. 6,323,853. The '853 Accused Products include each of Defendants' mobile devices, that have the capacity to send or receive text messages and/or email that are both (1) on or after 2006, made, used, imported, offered for sale, or sold in the United States, and (2) not covered by the license with Microsoft dated November 28, 2011. The '356 Accused Products infringe U.S. Patent No. 7,921,356. The '854

Accused Products, the ‘853 Accused Products and the ‘356 Accused Products are collectively referred to herein as the “Accused Products.”

In the attached Exhibit 1, Arendi has endeavored to identify, using publicly available information and without the benefit of any formal discovery, the product names and/or model numbers of the devices identified above. Providing such names and/or model numbers using only public information has been complicated by the frequently inconsistent naming conventions used by Defendants to characterize the products and/or their model numbers, the changes Defendants have made to the nomenclature used to describe the Accused Products during the relevant time period, in some cases changing the names multiple times per year, and the different product names used by resellers to identify what appear to be the same products. Accordingly, the names and/or model numbers included in Exhibit 1 should not be read as an exhaustive listing of the names and model numbers of the Accused Products during the relevant time periods.

Arendi welcomes the opportunity to confer with defendants for the purpose of providing a more accurate list of the Accused Products as defined above, and believes that such a conference will facilitate streamlined discovery and cost reduction for both sides.

For the avoidance of doubt, however, if a device meets the definition of Accused Products set forth above, but is not specifically listed on the attached Exhibit 1, it is nonetheless an Accused Product for purposes of these disclosures.

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