

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<hr/>	)	
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/>	)	

---

ARENDI S.A.R.L., )  
 )  
 Plaintiff, )  
 )  
 v. ) C.A. No. 12-1601-LPS  
 )  
 MOTOROLA MOBILITY LLC )  
 f/k/a MOTOROLA MOBILITY, INC., )  
 )  
 Defendant. )  
 )

---

ARENDI S.A.R.L., )  
 )  
 Plaintiff, )  
 )  
 v. ) C.A. No. 12-1602-LPS  
 )  
 SONY MOBILE COMMUNICATIONS (USA) )  
 INC. f/k/a SONY ERICSSON MOBILE )  
 COMMUNICATIONS (USA) INC., )  
 SONY CORPORATION and )  
 SONY CORPORATION OF AMERICA, )  
 )  
 Defendants. )  
 )

---

ARENDI S.A.R.L., )  
 )  
 Plaintiff, )  
 )  
 v. ) C.A. No. 13-919-LPS  
 )  
 GOOGLE INC. )  
 )  
 Defendant. )  
 )

---

ARENDI S.A.R.L., )  
 )  
 Plaintiff, )  
 )  
 v. ) C.A. No. 13-920-LPS  
 )  
 OATH HOLDINGS INC. and OATH INC, )  
 )  
 Defendant. )  
 )

---

**DEFENDANTS' MOTION TO EXCLUDE ROY WEINSTEIN'S OPINIONS AND TESTIMONY UNDER FED. R. EVID. 702 AND DAUBERT**

Defendants respectfully move to exclude testimony of Plaintiff Arendi S.a.r.L.'s damages expert Roy Weinstein under Federal Rule of Evidence 702. The grounds for this motion are set forth in the Opening Brief in Support of the motion filed contemporaneously herewith.

Dated: March 5, 2021

**OF COUNSEL:**

Mark D. Fowler (admitted *Pro Hac Vice*)  
Christine K. Corbett (admitted *Pro Hac Vice*)  
**DLA PIPER LLP (US)**  
2000 University Avenue  
East Palo Alto, CA 94303-2215  
Telephone: 650-833-2000  
Facsimile: 650-833-2001  
mark.fowler@us.dlapiper.com  
christine.corbett@us.dlapiper.com

Robert C. Williams (admitted *Pro Hac Vice*)  
**DLA PIPER LLP (US)**  
401 B Street, Suite 1700  
San Diego, CA 92101-4297  
Telephone: 619.699.2700  
Facsimile: 619.699.2701  
robert.williams@us.dlapiper.com

**DLA PIPER LLP (US)**

/s/ Brian A. Biggs  
Brian A. Biggs (DE Bar No. 5591)  
Erin E. Larson (DE Bar No. 6616)  
1201 North Market Street, Suite 2100  
Wilmington, DE 19801  
Telephone: 302-468-5700  
Facsimile: 302-394-2341  
brian.biggs@us.dlapiper.com  
erin.larson@us.dlapiper.com

*Attorneys for Defendant Apple Inc.*

Dated: March 5, 2021

**OF COUNSEL:**

Steven R. Katz  
Jacob Pecht  
Eda Stark  
One Marine Park Drive  
Boston, MA 02210  
(617) 542-5070  
[katz@fr.com](mailto:katz@fr.com)  
[Pecht@fr.com](mailto:Pecht@fr.com)  
stark@fr.com

R. Andrew Schwentker  
1000 Maine Ave SW  
Washington, D.C. 20024  
(202) 783-5070  
schwentker@fr.com

**FISH & RICHARDSON P.C.**

/s/ Jeremy D. Anderson

Jeremy D. Anderson (No. 4515)  
222 Delaware Avenue, 17<sup>th</sup> Floor  
P.O. Box 1114  
Wilmington, DE 19801  
(302) 652-5070  
janderson@fr.com

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

Dated: March 5, 2021

**MORRIS JAMES LLP**

*/s/ Kenneth L. Dorsney*

---

Kenneth L. Dorsney (No. 3726)  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
(302) 888-6800  
kdorsney@morrisjames.com

*Attorneys for 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.