

# EXHIBIT 23

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L.,

Plaintiff,

v.

LG ELECTRONICS INC.,  
LG ELECTRONICS USA, INC. and  
LG ELECTRONICS MOBILECOMM USA, INC.,

Defendants.

C.A. No. 12-1595 (LPS)

ARENDI S.A.R.L.,

Plaintiff,

v.

BLACKBERRY LIMITED and  
BLACKBERRY CORPORATION,

Defendants.

C.A. No. 12-1597 (LPS)

ARENDI S.A.R.L.,

Plaintiff,

v.

NOKIA CORPORATION and NOKIA INC.,

Defendants.

C.A. No. 12-1599 (LPS)

---

ARENDI S.A.R.L.,

Plaintiff,

v.

HTC CORP. a/k/a HIGH TECH COMPUTER CORP.,  
and HTC AMERICA INC., EXEDEA, INC.,

Defendants.

C.A. No. 12-1600 (LPS)

---

ARENDI S.A.R.L.,

Plaintiff,

v.

MOTOROLA MOBILITY LLC  
f/k/a MOTOROLA MOBILITY INC.,

Defendant.

C.A. No. 12-1601 (LPS)

---

ARENDI S.A.R.L.,

Plaintiff,

v.

SONY MOBILE COMMUNICATIONS (USA) INC.  
f/k/a SONY ERICSSON MOBILE  
COMMUNICATIONS (USA) INC.,  
SONY CORPORATION and  
SONY CORPORATION OF AMERICA,

Defendants.

C.A. No. 12-1602 (LPS)

ARENDI S.A.R.L.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

C.A. No. 13-0919 (LPS)

ARENDI S.A.R.L.,

Plaintiff,

v.

YAHOO! INC.,

Defendant.

C.A. No. 13-0920 (LPS)

**JOINT INITIAL INVALIDITY CONTENTIONS OF DEFENDANTS  
LG ELECTRONICS INC., LG ELECTRONICS USA, INC. AND LG ELECTRONICS  
MOBILECOMM U.S.A., INC.; BLACKBERRY LIMITED AND BLACKBERRY  
CORPORATION; NOKIA CORPORATION AND NOKIA INC.; HTC CORP. A/K/A  
HIGH TECH COMPUTER CORP, HTC AMERICA, INC., AND EXEDEA, INC.;  
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, AND  
SONY CORPORATION OF AMERICA; GOOGLE INC.; AND YAHOO! INC.**

Defendants LG Electronics Inc., LG Electronics USA, Inc. and LG Electronics MobileComm U.S.A., Inc.; Blackberry Limited and Blackberry Corporation; Nokia Corporation and Nokia Inc.; HTC Corp. a/k/a High Tech Computer Corp, HTC America, Inc., and Exedea, Inc.; 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, and Sony Corporation of America; Google Inc.; and Yahoo! Inc. (collectively, “Defendants”) serve their Joint Initial Invalidity Contentions (“Invalidity Contentions”) and accompanying document production on Plaintiff Arendi S.A.R.L. (“Plaintiff”). Each Defendant contends that each of the claims of U.S. Patent Nos. 7,496,854 (“the ‘854 patent”), 7,917,843 (“the ‘843 patent”), 6,323,853 (“the ‘853 patent”), 7,921,356 (“the ‘356 patent”), and 8,306,993 (“the ‘993 patent”) (collectively, “patents-in-suit”) that are asserted against that Defendant is invalid under at least 35 U.S.C. §§ 101, 102, 103, and/or 112.<sup>1</sup>

## I. INTRODUCTION

Plaintiff filed this action alleging that the Defendants infringe some or all of the patents-in-suit. Each Defendant contends that the claims of the patents-in-suit asserted against that Defendant are invalid and not infringed. As indicated in its Disclosure of Asserted Claims and Infringement Contentions (“Infringement Contentions”), Plaintiff asserts some or all of claims 19, 25, 36, 43, 57, 60, 63, 64, 72 and 73 of the ‘854 patent, claims 1, 8, 13, 15, 17-19, 23 and 30 of the ‘843 patent, claims 1, 5, 8, 9, 13, 16, 17, 18, 21 and 24 of the ‘993 patent, claims 1, 14-16 and 79 of the ‘853 patent, and claims 1, 12, 16 and 20 of the ‘356 patent against numerous products of various Defendants. The Invalidity Contentions are based at least in part on Defendants’ current understanding of the asserted claims and Plaintiff’s apparent construction of those claims, as

---

<sup>1</sup> Because the patents-in-suit are not subject to the first inventor to file provisions of the America Invents Act, the pre-AIA version of 35 U.S.C. §§ 102, 103, and/or 112 apply to this case.

# 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.