

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

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	C.A. No. 13-919-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GOOGLE LLC,)	PUBLIC VERSION
)	
Defendant.)	

**DECLARATION OF ROBERT UNIKEL IN SUPPORT OF GOOGLE LLC'S
MOTION FOR SUMMARY JUDGMENT OF NONINFRINGEMENT**

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MOTION FOR SUMMARY JUDGMENT OF NONINFRINGEMENT**

I, Robert Unikel, declare as follows:

1. I am an attorney at Paul Hastings LLP, counsel for Google LLC in this matter. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Attached as **Exhibit 1** is a true and correct copy of excerpts from the Expert Report of Dr. Trevor Smedley (and Appendix) regarding Google’s purported infringement dated August 7, 2020; Appendix, p. 1-135; Ex. B.
3. Attached as **Exhibit 2** is a true and correct copy of excerpts from the Reply Expert Report of Dr. Trevor Smedley regarding Google’s purported infringement dated December 4, 2020.
4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Trevor Smedley taken on January 19, 2021.
5. Attached as **Exhibit 4** is a true and correct copy of a document titled “Linkify” found at <https://developer.android.com/reference/android/text/util/Linkify> and produced as RINARD_GOOGLE_0000994-0001012.

6. Attached as **Exhibit 5** is [REDACTED] [REDACTED]
[REDACTED].
7. Attached as **Exhibit 6** is a true and correct copy of a document titled “Linkify your Text!” produced as GOOG101890-91.
8. Attached as **Exhibit 7** is [REDACTED] [REDACTED]
[REDACTED].
9. Attached as **Exhibit 8** is a true and correct copy of a document titled “WikiNotes for Android: Routing Intents” produced at GOOG00101900.
10. Attached as **Exhibit 9** is a true and correct copy of the Accelerated Examination Support Document submitted on July 22, 2010 during the prosecution of Patent No. 7,921,356, produced as AHL0164696-845.
11. Attached as **Exhibit 10** is a true and correct copy of U.S. Patent No. 6,323,853 (“Hedloy”).
12. Attached as **Exhibit 11** is a true and correct copy of U.S. Patent No.5,946,647 (“Goodwin”).
13. Attached as **Exhibit 12** is a true and correct copy of U.S. Patent No. 5,644,735 (“Luciw”).
14. Attached as **Exhibit 13** is a true and correct copy of the Patent Owner’s Post-Institution Response in IPR2014-00452 brought against U.S. Patent No. 6,323,853, produced at ARENDI148474-536.
15. Attached as **Exhibit 14** is a true and correct copy of excerpts from the transcript of the deposition of Atle Hedloy, taken on October 29, 2019.
16. Attached as **Exhibit 15** is a true and correct copy of excerpts from the transcript of the

deposition of Atle Hedloy, taken on November 5, 2019.

17. Attached as **Exhibit 16** is a true and correct copy of excerpts from the transcript of the deposition of Atle Hedloy, taken on November 6, 2019.

18. Attached as **Exhibit 17** is a true and correct copy of <https://developer.android.com/guide/platform>, produced at RINARD_GOOGLE_0001242-46.

19. Attached as **Exhibit 18** is a true and correct copy of the Petition for Inter Partes review IPR2014-00208 for U.S. Patent No. 7,917,843, produced at FOX_0009000.

20. Attached as **Exhibit 19** is a true and correct copy of Exhibit 1006 from IPR petition IPR2014-00208, produced at FOX_0009655, and which includes a copy of “From Document to Objects, An Overview of LiveDoc” at FOX_0009659 and “Drop Zones, An Extension to LiveDoc” at FOX_0009665 (collectively “LiveDoc/DropZones”).

21. Attached as **Exhibit 20** is a true and correct copy of “Common Intents” from <https://developer.android.com/guide/components/intents-common>, produced at ARENDI_G329272.

22. Attached as **Exhibit 21** is a true and correct copy of “Newton Programmer’s Guide,” produced at ARENDI-DEFS00003649.

23. Attached as **Exhibit 22** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Martin Rinard taken on December 17, 2021.

24. Attached as **Exhibit 23** is [REDACTED].

25. Attached as **Exhibit 24** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Earl Sacerdoti taken on January 20, 2021.

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