

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

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	C.A. No. 12-1601-LPS
v.)	
)	JURY TRIAL DEMANDED
MOTOROLA MOBILITY LLC F/K/A)	
MOTOROLA MOBILITY, INC.,)	PUBLIC VERSION
)	
Defendant.)	
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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 DEFENDANTS' BRIEF IN
OPPOSITION TO ARENDI'S MOTION TO EXCLUDE IN PART THE EXPERT
REPORTS AND TESTIMONY OF EDWARD FOX**

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OPPOSITION TO ARENDI'S MOTION TO EXCLUDE IN PART THE EXPERT
REPORTS AND TESTIMONY OF EDWARD FOX**

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 the Expert Report of Edward Fox, Ph.D. On the Invalidity of U.S. Patent No. 7,917,843, dated August 7, 2020.
3. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Dr. Earl Sacerdoti Regarding Validity of U.S. Patent No. 7,917,843, dated October 20, 2020.

4. Attached as **Exhibit 3** is a true and correct copy of the Reply Expert Report of Edward Fox, Ph.D. On the Invalidity of U.S. Patent No. 7,917,843, dated December 4, 2020.
5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Edward Fox, dated January 15, 2021.
6. Attached as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the deposition of Dr. Earl Sacerdoti, dated January 20, 2021.
7. On March 4, 2021, during a meet-and-confer discussion with Arendi's counsel, Arendi's counsel raised, for the first time, Arendi's view that Dr. Fox's reports were unreliable and subject to a legal challenge. Arendi filed its pending Motion to Exclude In Part the Expert Reports and Testimony of Edward Fox the next day.
8. Attached as **Exhibit 6** is a true and correct copy of excerpts of the Opening Expert Report of Dr. Kevin C. Almeroth on Invalidity of US. Patent Nos., 7,747,730 and 9,663,659, as filed in *Netfuel, Inc. v. Cisco Systems, Inc.*, No. 5:18-cv-2352-EJD, D.I. 263-2 (N.D. Cal. Jan. 21, 2020).
9. Attached as **Exhibit 7** is a true and correct copies of Accelerated Examination Support Documents filed by patent applicant Atle Hedloy on July 22, 2010, December 9, 2010, May 19, 2011, and January 10, 2011.
10. Attached as **Exhibit 8** is a true and correct copy excerpts of the Expert Report of Dr. Trevor Smedley Regarding Infringement of U.S. Patent No. 7,917,843.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on April 6, 2021, at Chicago, Illinois.

/s/ Robert W. Unikel
Robert W. Unikel