

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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.

GOOGLE LLC,

Defendant.

C.A. No. 13-919-LPS

**DECLARATION OF IBITUROKO-EMI LAWSON IN SUPPORT OF ARENDI'S
MOTION TO EXCLUDE IN PART THE EXPERT REPORTS AND TESTIMONY OF
EDWARD FOX**

I, Ibituroko-Emi Lawson, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.

2. I am an attorney at the law firm Susman Godfrey LLP, counsel of record for Plaintiff, Arendi S.à.r.l. ("Arendi"), in the above-captioned action. I am admitted *pro hac vice* to practice before this Court.

3. Attached as Exhibit 1 is a true and correct copy of the Declaration of Brett M. Hutton, Esq. in Support of Plaintiff's Motion to Strike the Expert Report of Peter Seifert and Preclude Mr. Seifert from Testifying at Trial Regarding Invalidity of the '940 Patent, together with

Exhibit A to that declaration (entitled “Expert Report of Peter Seifert on the Invalidity of U.S. Patent RE39,940”), filed in *Advanced Fiber Technologies (AFT) Trust v. J&L Fiber Services, Inc.*, No. 07-1191 LEK/DRH (N.D.N.Y. Oct. 1, 2019).

4. Together with Kemper Diehl and Neal Belgam, also counsel for Arendi, I met and conferred with counsel for Motorola Mobility LLC and Google LLC (“Defendants”) on March 4, 2021. During that call, counsel discussed both Arendi’s instant *Daubert* motion to exclude against Dr. Fox and Defendants’ own intended motions against Arendi’s experts, Roy Weinstein and M. Laurentius Marais. Defendants had not previously informed Arendi of their intended *Daubert* motions. Contrary to Defendants’ assertion in their brief, counsel did not meet and confer “the night before” March 5, 2021 (C.A. No. 12-1601-LPS, D.I. 332, at 6), but rather at 12 pm EST during a teleconference proposed by Arendi’s counsel on February 25, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of May, 2021, at Houston, Texas.

/s/ Ibituroko-Emi Lawson
Ibituroko-Emi Lawson