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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-919-LPS
	)	
GOOGLE LLC,	)	<b>Original Version Filed: May 4, 2021</b>
	)	<b>Public Version Filed: May 11, 2021</b>
Defendants.	)	
	)	
	)	

**PLAINTIFF’S REPLY BRIEF IN SUPPORT OF ITS MOTION TO EXCLUDE  
PORTIONS OF DR. MARTIN RINARD’S EXPERT REPORT**

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Dr. Rinard offers opinions that must be excluded because they advance and rely on claim constructions that impermissibly narrow the Court's constructions and deviate from the plain meaning of unconstrued claim terms. Further, dozens of paragraphs in Dr. Rinard's report show that [REDACTED]. All of this belonged before the Court, if ever, at *Markman*. It does not belong before the jury at trial as part of an effort to argue claim scope. Google's brief tries to distract from Dr. Rinard's claim construction arguments by asserting that his voluminous [REDACTED] "merely buttresses the Court's construction" of claim terms, (D.I. 338 at 7), but this is nowhere stated in Dr. Rinard's report. It also makes no sense to [REDACTED] in an expert report if it "merely buttresses" the constructions the jury will apply. Google is attempting, through its expert, to persuade the jury to deviate from the Court's constructions and constrict the plain and ordinary scope of unconstrued claim terms. Both are prohibited under well-settled law.

**I. THE COURT SHOULD EXCLUDE DR. RINARD'S "THAT CAN BE SEARCHED FOR" CONSTRUCTION AND RELATED OPINIONS.**

Contrary to Google's argument, there is no dispute that the phrase "that can be searched for" is part of the asserted claims and part of the Court's construction. There is no dispute that it has definite meaning. Far from asking the Court to ignore this language, as Google contends, Arendi seeks to have its plain and ordinary meaning govern and to preclude Dr. Rinard from arguing for a narrower interpretation at trial.

The Court's construction is clear that there need only be a single determination. As the Court's construction says, the accused product must "determine if the first information *belongs to* one or more of several predefined categories of identifying (e.g., a name) or contact information (e.g., a phone number, a fax number, or an email address) that can be searched for in an information [REDACTED]

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