

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

ARENDI S.A.R.L.,

Plaintiff,

v.

LG ELECTRONICS INC.,
LG ELECTRONICS U.S.A., INC., and
LG ELECTRONICS MOBILECOMM U.S.A.,
INC.,

Defendants.

C.A. No. 12-cv-01595-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

ARENDI S.A.R.L.,

Plaintiff,

v.

APPLE INC.,

Defendant.

C.A. No. 12-cv-01596-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

ARENDI S.A.R.L.,

Plaintiff,

v.

BLACKBERRY LIMITED and
BLACKBERRY CORPORATION,

Defendants.

C.A. No. 12-cv-1597-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

ARENDI S.A.R.L.,

Plaintiff,

v.

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

Defendants.

C.A. No. 12-cv-1601-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

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-cv-1602-LPS

JURY TRIAL DEMANDED

FILED UNDER SEAL

ARENDI S.A.R.L.,
Plaintiff,

v.

GOOGLE LLC,
Defendant.

ARENDI S.A.R.L.,
Plaintiff,

v.

OATH HOLDINGS INC., and
OATH INC.,
Defendants.

C.A. No. 13-cv-0919-LPS

JURY TRIAL DEMANDED

████████████████████

FILED UNDER SEAL

C.A. No. 13-cv-0920-LPS

JURY TRIAL DEMANDED

████████████████████

FILED UNDER SEAL

**DEFENDANTS' REPLY IN SUPPORT OF THEIR MOTION TO
EXCLUDE OPINIONS AND TESTIMONY OF PLAINTIFF'S
EXPERT DR. M. LAURENTIUS MARAIS UNDER FED. R. EVID. 702¹**

¹ Defendants have filed an identical Reply in Support of their Motion to Exclude Opinions and Testimony of Dr. M. Laurentius Marais Under Fed. R. Evid 702 in each of their respective cases. All citations to the docket are to the docket in *Arendi S.A.R.L. v. LG Electronics Inc.*, No. 12-cv-1595-LPS.

*Attorneys for LG Defendants
LG Electronics Inc.,
LG Electronics U.S.A., Inc., and
LG Electronics Mobilecomm U.S.A., Inc.*

Jeremy D. Anderson (No. 4515)
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899
Telephone: (302) 652-5070
Facsimile: (302) 652-0607
Email: janderson@fr.com

Steven R. Katz
Jacob Pecht
Eda Stark
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, MA 02210-1878
Telephone: (617) 542-5070
Email: katz@fr.com; pecht@fr.com;
stark@fr.com

R. Andrew Schwentker
FISH & RICHARDSON P.C.
1000 Maine Ave. SW, Suite 1000
Washington, D.C. 20024
Telephone: (202) 783-5070
Email: schwentker@fr.com

Attorneys for Defendant Apple Inc.

Brian A. Biggs (No. 5591)
Erin E. Larson (No. 6616)
DLA PIPER LLP (US)
1201 North Market Street, Suite 2100
Wilmington, DE 19801
Telephone: (302) 468-5700
Facsimile: (302) 394-2341
brian.biggs@us.dlapiper.com
erin.larson@us.dlapiper.com

Mark D. Fowler
Christine K. Corbett
DLA PIPER LLP (US)
2000 University Avenue
East Palo Alto, CA 94303-2215
Telephone: (650) 833-2000
Facsimile: (650) 833-2001
mark.fowler@us.dlapiper.com
christine.corbett@us.dlapiper.com

Robert C. Williams
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Telephone: (619) 699-2700
Facsimile: (619) 699-2701
robert.williams@us.dlapiper.com

*Attorneys for Defendants
BlackBerry Corporation and BlackBerry LTD.*

Kenneth L. Dorsney (No. 3726)
MORRIS JAMES LLP
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
kdorsney@morrisjames.com

OF COUNSEL:

Brian C. Riopelle
David E. Finkelson
MCGUIRE WOODS LLP
One James Center
901 E. Cary Street
Richmond, VA 23219
Telephone: (804) 775-1000
briopelle@mcguirewoods.com
dfinkelson@mcguirewoods.com

Jason W. Cook
MCGUIRE WOODS LLP
2000 McKinney Avenue, Suite 1400
Dallas, TX 75201
Telephone: (214) 932-6400
jcook@mcguirewoods.com

*Attorneys for Defendants Motorola Mobility
LLC f/k/a Motorola Mobility, Inc., and Google
Inc.*

David E. Moore (No. 3983)
Bindu A. Palapura (No. 5370)
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Telephone: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com

Robert W. Unikel
Michelle Marek Figueiredo
John Cotiguala
Matt Lind
PAUL HASTINGS LLP
71 South Wacker Drive, Suite 4500
Chicago, IL 60606
Telephone: (312) 449-6000

Robert R. Laurenzi
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000

Ariell Bratton
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
Telephone: (858) 458-3000

Attorneys for Defendants

*Sony Mobile Communications (USA) Inc. f/k/a
Sony Ericsson Mobile Communications (USA)
Inc., Sony Corporation, and Sony Corporation of
America*

Rodger D. Smith, II (No. 3778)
MORRIS, NICHOLS, ARSHT & TUNNELL
LLP
1201 N. Market Street
Wilmington, DE 19801
Telephone: (302) 658-9200
rsmith@mnat.com

OF COUNSEL:

Jeffri A. Kaminski
Justin Pierce
Calvin R. Nelson
Neha Bhat
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
(202) 344-4000

Attorneys for Defendants

Oath Holdings Inc. and Oath Inc.

Jack B. Blumenfeld (No. 1014)
Brian P. Egan (No. 6227)
Anthony D. Raucci (No. 5948)
MORRIS, NICHOLS, ARSHT & TUNNELL
LLP
1201 North Market Street
Wilmington, DE 19801
Telephone: (302) 658-9200
jblumenfeld@mnat.com
began@mnat.com
araucci@mnat.com

OF COUNSEL:

Frank C. Cimino, Jr.
Megan S. Woodworth
Jeffri A. Kaminski
Calvin R. Nelson
Neha Bhat
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
(202) 344-4000

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.