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

ARENDI S.A.R.L.,	)
Plaintiff,	) ) ) C.A. No. 12-1601-JLH
V.	) ) JURY TRIAL DEMANDED
MOTOROLA MOBILITY LLC F/K/A MOTOROLA MOBILITY, INC.,	) ) DVDV VG VEDGVOV
Defendant.	) PUBLIC VERSION
ARENDI S.A.R.L.,	
Plaintiff,	) C.A. No. 13-919-JLH
V.	) JURY TRIAL DEMANDED
GOOGLE LLC,	) PUBLIC VERSION
Defendant.	)

# DECLARATION OF ROBERT UNIKEL IN SUPPORT OF DEFENDANTS' MOTION FOR CLARIFICATION OF CLAIM CONSTRUCTION

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ARENDI S.A.R.L.,	)
Plaintiff, v.  MOTOROLA MOBILITY LLC F/K/A MOTOROLA MOBILITY, INC.,	) ) C.A. No. 12-1601-JLH ) ) JURY TRIAL DEMANDED ) PUBLIC VERSION
Defendant.	)
ARENDI S.A.R.L.,	
Plaintiff,	) C.A. No. 13-919-JLH
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GOOGLE LLC,	PUBLIC VERSION
Defendant.	)

# DECLARATION OF ROBERT UNIKEL IN SUPPORT OF DEFENDANTS' MOTION FOR CLARIFICATION OF CLAIM CONSTRUCTION

#### I, Robert Unikel, declare as follows:

- 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 Non-Final Office Action for Patent Application No. 12/182,048, dated October 28, 2010 bearing Bates numbers FOX 0001313 through FOX 0001347. Patent Application No. 12/182,048 843 issued as U.S. Patent No. 7,917,843 ("843 patent") on March 29, 2011.
- 3. Attached as **Exhibit 2** is a true and correct copy of the Supplemental Response A for Patent Application No. 12/182,048, dated December 21, 2010 bearing Bates numbers FOX



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0002941 through FOX 0002974. Patent Application No. 12/182,048 843 issued as U.S.

Patent No. 7,917,843 ("'843 patent") on March 29, 2011.

4. Attached as Exhibit 3 is a true and correct copy of excerpts from the Rebuttal Expert

Report of Dr. Martin Rinard on Non-Infringement of U.S. Patent No. 7,917,843, dated

October 20, 2020.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the January 20, 2021

video-recorded remote deposition of Earl Sacerdoti, PhD.

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 January 19, 2023, at Chicago, Illinois.

/s/ Robert W. Unikel
Robert W. Unikel

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