

Exhibit A

From: [John Lahad](#)
To: [Unikel, Robert](#); [Failla, Melissa J.](#); [Kalpana Srinivasan](#); [Max Straus](#); [Seth Ard](#); [Rachel Solis](#); [Kemper Diehl](#); [Richard Wojtczak](#); dtaylor@skjlaw.com; nbelgam@skjlaw.com; smb@skjlaw.com
Cc: shamlin@Potteranderson.com; vinny.ling@mto.com; bpalapura@potteranderson.com; dmoore@potteranderson.com; ginger.anders@mto.com; [Google-Arendi](#); [Susan M. Betts](#); [Neal C. Belgam](#)
Subject: [EXT] RE: Meet and Confer Concerning IPR Proceedings Issue
Date: Friday, April 21, 2023 10:53:55 PM
Attachments: [Weinstein - Supp Reply Exhibits \(Highlighted\).pdf](#)

--- External Email ---

Rob-
Confirmed as to CD and CSQA.

Arendi will present a total damages figure of [REDACTED] at trial.

This is reached by taking Exhibits 1B and 2B to Mr. Weinstein's supplemental reply report and excluding (i) all units of the News app; (ii) units of the Chrome app from before August 21, 2017; and (iii) all Pixel 1 / Pixel XL units.

These exhibits are re-attached here for convenience. The units now being excluded from the damages figure are highlighted. The Chrome units for 2017 are pro-rated in the same manner as the other apps, such that the accused Chrome units in 2017 are now [REDACTED].

Thank you.

John P. Lahad

Partner | Susman Godfrey LLP

Houston | New York | Los Angeles | Seattle

713.653.7859 (o) 713.725.3557 (m)

From: Unikel, Robert <robertunikel@paulhastings.com>
Sent: Friday, April 21, 2023 8:03 PM
To: John Lahad <jlahad@SusmanGodfrey.com>; Failla, Melissa J. <melissafailla@paulhastings.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Max Straus <MStraus@susmangodfrey.com>; Seth Ard <sard@susmangodfrey.com>; Rachel Solis <RSolis@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; dtaylor@skjlaw.com; nbelgam@skjlaw.com; smb@skjlaw.com
Cc: shamlin@Potteranderson.com; vinny.ling@mto.com; bpalapura@potteranderson.com; dmoore@potteranderson.com; ginger.anders@mto.com; Google-Arendi <Google-Arendi@paulhastings.com>; Susan M. Betts <SMB@skjlaw.com>; Neal C. Belgam <NCB@skjlaw.com>

Subject: RE: Meet and Confer Concerning IPR Proceedings Issue

EXTERNAL Email

John,

At the end of our call a bit ago, you stated that Arendi is dropping its infringement claim against Chrome using Content Detectors and Contextual Search Quick Actions. Please confirm that this is correct by reply email ASAP.

When I asked you what Arendi's new damages demand is, you did not have a number readily available, but promised to send that number, along with your method of calculating that number, tonight so that we can consider the impact of this withdrawal on the case.

Rob

From: John Lahad <jlahad@SusmanGodfrey.com>
Sent: Friday, April 21, 2023 6:33 PM
To: Unikel, Robert <robertunikel@paulhastings.com>; Failla, Melissa J. <melissafailla@paulhastings.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Max Straus <MStraus@susmangodfrey.com>; Seth Ard <sard@susmangodfrey.com>; Rachel Solis <RSolis@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; dtaylor@skjlaw.com; nbelgam@skjlaw.com; smb@skjlaw.com
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How about 8 pm eastern? Can you circulate a dial-in please?

John P. Lahad

Partner | Susman Godfrey LLP

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From: Unikel, Robert <robertunikel@paulhastings.com>

Sent: Friday, April 21, 2023 4:42 PM

To: John Lahad <jlahad@SusmanGodfrey.com>; Failla, Melissa J. <melissafailla@paulhastings.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Max Straus <MStraus@susmangodfrey.com>; Seth Ard <sard@susmangodfrey.com>; Rachel Solis <RSolis@susmangodfrey.com>; Kemper Diehl <KDiehl@susmangodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; dtaylor@skjlaw.com; nbelgam@skjlaw.com; smb@skjlaw.com
Cc: shamlin@Potteranderson.com; vinny.ling@mto.com; bpalapura@potteranderson.com; dmoore@potteranderson.com; ginger.anders@mto.com; Google-Arendi <Google-Arendi@paulhastings.com>; Susan M. Betts <SMB@skjlaw.com>; Neal C. Belgam <NCB@skjlaw.com>
Subject: Meet and Confer Concerning IPR Proceedings Issue

EXTERNAL Email

Arendi team,

Per the Court's instruction, we would like to schedule a meet and confer call with you tonight to discuss potential paths to resolve the IPR proceedings issue. Please let us know when you are available.

Thanks,

Rob

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