

SMITH KATZENSTEIN
JENKINS LLP

May 15, 2023

Via CM/ECF

The Honorable Jennifer L. Hall
J. Caleb Boggs Federal Building
844 N. King Street
Unit 17, Room 3124
Wilmington, DE 19801-3555

Re: *Arendi S.A.R.L. v. Google LLC (13-919-JLH)*

Dear Judge Hall:

Pursuant to the Court's Order for a joint status letter that sets forth the parties' proposals regarding how the case should proceed (D.I. 546), the parties jointly submit this letter.

Arendi and Google anticipate that Arendi will file Rule 50(b) motions and propose that opening briefs be due on or before June 2, 2023; responsive briefs be due on or before June 30, 2023; and reply briefs be due on or before July 21, 2023, subject to the page limits set forth in Paragraph 23 of the Court's Form Scheduling Order for Patent Cases. The parties submit that all other deadlines for post-trial proceedings should be governed by the applicable rules.

Arendi presently intends to renew motions for judgment as a matter of law which it made on the record on May 1, 2023, pursuant to Fed. R. Civ. P. 50(a). Trial Tr. 1423:20-1428:20. Specifically, Arendi intends to file motions for judgment as a matter of law of no invalidity for anticipation under 35 U.S.C. § 102 and no invalidity for obviousness under 35 U.S.C. § 103. Arendi further intends to file a motion for judgment as a matter of law of no invalidity pursuant to 35 U.S.C. § 315(e) and common law estoppel principles.

Google does not presently intend to file any Rule 50(b) motions. It reserves the right to file motions for costs and attorney's fees, pursuant to the deadlines under the Court's Judgment dated May 10, 2023 (D.I. 545).

Thank you for Your Honor's assistance.

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Respectfully,

Neal C. Belgam

Neal C. Belgam (No. 2721)

cc: Clerk of Court (via CM/ECF)
All Counsel of Record (via CM/ECF)