IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ALMONDNET, INC. and INTENT IQ, LLC,)
Plaintiffs,)
v.) C.A. No. 23-1373 (MN)
LINKEDIN, CORPORATION,)
Defendant.)

DEFENDANT'S RULE 12(B)(6) MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant LinkedIn, Corp. respectfully moves for an order, substantially similar to the proposed order attached hereto, dismissing Plaintiffs' claims for induced, contributory, and willful infringement of the '139, '146, '398, and '878 patents alleged in Counts VI, VII, VIII, and IX of the Complaint (D.I. 1 at ¶¶ 46–48, 56–58, 66–68, 76–78). The grounds for this motion are set forth in the accompanying Opening Brief.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith II

OF COUNSEL:

David J. Silbert
Michelle Ybarra
Erin E. Meyer
Theresa Dawson
Amos J. B. Espeland
Sydnee Joi Robinson
KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809
(415) 391-5400

Jack B. Blumenfeld (#1014)
Rodger D. Smith II (#3778)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19801
(302) 658-9200
jblumenfeld@morrisnichols.com
rsmith@morrisnichols.com

Attorneys for Defendant

February 12, 2024



IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ALMONDNET, INC. and INTENT IQ, LLC,)	
Plaintiffs, v. LINKEDIN, CORPORATION, Defendant.))) C.A. No. 23-1373 (MN)))	
[PROPOSED] ORDER		
At Wilmington this day	of, 2024, the Court having	
considered Defendant LinkedIn, Corp.'s Rule 12(b)(6) Motion to Dismiss (the "Motion"), and the		
papers and argument submitted in connection the	erewith,	
IT IS HEREBY ORDERED that:		
1. Defendant's Motion is GF	RANTED; and	
2. Plaintiffs' claims for indu	ced, contributory, and willful infringement of the	
'139, '146, '398, and '878 patents alleged in Cou	ents VI, VII, VIII, and IX of the Complaint (D.I. 1	
at ¶¶ 46–48, 56–58, 66–68, 76–78) are DISMISS	SED.	
	The Honorable Maryellen Noreika United States District Judge	



CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 12, 2024, upon the following in the manner indicated:

Brian E. Farnan, Esquire Michael J. Farnan, Esquire FARNAN LLP 919 North Market Street, 12th Floor Wilmington DE 19801 Attorneys for Plaintiffs VIA ELECTRONIC MAIL

Reza Mirzaie, Esquire
Ben Wang, Esquire
James Milkey, Esquire
Amy Hayden, Esquire
James Tsuei, Esquire
Daniel Kolko, Esquire
Jason Wietholter, Esquire
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
Attorneys for Plaintiffs

VIA ELECTRONIC MAIL

/s/ Rodger D. Smith II

Rodger D. Smith II (#3778)

