

1 *Counsel in Signature Block*

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5 UNITED STATES DISTRICT COURT  
6 CENTRAL DISTRICT OF CALIFORNIA

7 BLACKBERRY LIMITED,

8 Plaintiff,

9 v.

10 FACEBOOK, INC., WHATSAPP INC.,  
11 and INSTAGRAM LLC,

12 Defendants.

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14  
15 SNAP INC.,

16 Defendant.

Case Nos. 2:18-cv-01844;  
2:18-cv-02693 GW(KSx)

**DEFENDANTS' NOTICE AND  
MOTION TO STAY PENDING  
INTER PARTES REVIEW**

The Hon. George H. Wu

Hearing Date: May 16, 2019

Time: 8:30 A.M.

Place: Courtroom 9D

1           **PLEASE TAKE NOTICE** that on May 16, 2019, at 8:30 a.m., or as soon as the  
2 matter may be heard, in this Court, located at United States Courthouse,  
3 350 West 1<sup>st</sup> Street, Los Angeles, CA, 90012, Courtroom 9D, 9th Floor, Defendants  
4 Facebook, Inc., WhatsApp Inc., and Instagram, LLC (collectively,  
5 the “Facebook Defendants”) and Snap Inc. (“Snap”) will and hereby do move to stay  
6 this eleven-patent case pending *inter partes* review institution decisions by the  
7 Patent Office.

8           This motion is based upon this notice, the accompanying memorandum of points  
9 and authorities, the declaration of Matthew J. Brigham (and accompanying exhibits),  
10 the declaration of Chad Peterman (and accompanying exhibits), the proposed order, and  
11 upon such other and further matters, papers, and arguments as may be submitted to the  
12 Court.

13           This motion is made following the conference of counsel pursuant to L.R. 7-3,  
14 which took place on April 5 and April 9, 2019.

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2 Dated: April 16, 2019

RESPECTFULLY SUBMITTED,

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4 /s/ Heidi L. Keefe

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FACEBOOK, INC., WHATSAPP INC.,  
INSTAGRAM, INC., and  
INSTAGRAM, LLC

1 DATED: April 16, 2019

RESPECTFULLY SUBMITTED,

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**FILER’S ATTESTATION**

I, Heidi L. Keefe, am the ECF user whose ID and password are being used to file this DEFENDANTS’ NOTICE AND MOTION TO STAY PENDING INTER PARTES REVIEW. Pursuant to L.R. 5-4.3.4.(a)(2), I hereby attest that counsel for Snap concurred in the filing of this document.

/s/ Heidi L. Keefe  
Heidi L. Keefe

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