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21 Attorneys for Plaintiff BlackBerry Limited

22
23 IN THE UNITED STATES DISTRICT COURT
24 FOR THE CENTRAL DISTRICT OF CALIFORNIA

25 BLACKBERRY LIMITED, a
26 Canadian corporation,
27
28 Plaintiffs,
29
30 v.
31
32 SNAP INC., a Delaware corporation
33
34 Defendant.

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BLACKBERRY CORPORATION
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Case No. 2:18-cv-01844-GW-KS
LEAD CONSOLIDATED CASE
Related Case: 2:18-cv-02693-GW-KS

**BLACKBERRY LIMITED'S FINAL
ELECTION OF ASSERTED
CLAIMS**

1 Pursuant to the Updated Joint Case Scheduling Report (See Case No. 2:18-cv-
2 01844 GW(KSx), Dkt. No. 94), the Court’s adoption of the parties’ proposed
3 schedule (Dkt. 96), and the Court’s order extending time for claim narrowing (Dkt.
4 200), Plaintiff BlackBerry Limited (“BlackBerry”) hereby submits its Final Election
5 of Asserted Claims for U.S. Patent Nos. 8,825,084 (“’084 Patent”), 8,326,327
6 (“’327 Patent”), 8,301,713 (“’713 Patent”), 8,209,634 (“’634 Patent”), 8,296,351
7 (“’351 Patent”), 8,676,929 (“’929 Patent”) (collectively, the “patents-in-suit” or the
8 “Asserted Patents”).

9 Discovery is ongoing, and BlackBerry continues to seek discovery from
10 Defendant Snap Inc. (“Snap”) that may affect BlackBerry’s election of asserted
11 claims. BlackBerry has served discovery requests on Snap to obtain additional
12 information relevant to infringement that is in Snap’s possession, custody, or
13 control. BlackBerry reserves the right to supplement and/or amend these elections
14 based on the discovery Snap provides in response to BlackBerry’s discovery
15 requests. In particular, BlackBerry reserves the right to supplement and/or amend
16 these elections after it has received a complete production of documents, after it has
17 completed its inspection and review of Defendants’ proprietary and confidential
18 technical information for the Accused Instrumentalities, including source code and
19 technical specifications, and after it has had an opportunity to depose Defendant’s
20 employees and engineers with knowledge of the structure, function, and/or operation
21 of the Accused Instrumentalities. BlackBerry will provide any such amendments
22 and/or modifications in accordance with the Court’s guidance, the Case Scheduling
23 Order, and any amendments thereto.

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U.S. Patent No.	Final Election of Asserted Claim(s)
8,825,084 ("the '084 Patent")	1, 2, 6
8,326,327 ("the '327 Patent")	1, 2, 3, 9
8,209,634 ("the '634 Patent")	1, 5
8,301,713 ("the '713 Patent")	3
8,296,351 ("the '351 Patent")	1, 2, 14, 20, 21
8,676,929 ("the '929 Patent")	1, 9, 16

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DATED: May 31, 2019

Respectfully Submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ James R. Asperger

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Francisco, State of California. My business address is 50 California Street, 22nd Floor, San Francisco, CA 94111.

On May 31, 2019, I served true copies of the following document(s) described as **BLACKBERRY LIMITED'S FINAL ELECTION OF ASSERTED CLAIMS** on the interested parties in this action as follows:

SEE ATTACHED LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I transmitted PDF format copies of the document(s) described above to the e-mail addresses on the attached Service List. The documents were transmitted by electronic transmission and such transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 31, 2019, at San Francisco, California.

/s/ Zachary Flood

Zachary Flood

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