

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SISVEL INTERNATIONAL S.A.,
and 3G LICENSING S.A.,

Plaintiffs,

v.

DELL, INC.,

Defendant.

Civil Action No. 1:19-cv-01247-LPS

**JOINT STATUS REPORT REGARDING DEFENDANT’S MOTION TO DISMISS
PURSUANT TO COURT ORDER (D.I. 19)**

Plaintiffs Sisvel International S.A. and 3G Licensing S.A. (“Sisvel”), and Defendant Dell, Inc. (“Dell”) hereby submit this Joint Status Report pursuant to the Court’s Order dated February 18, 2020 (D.I. 19).

On November 12, 2019 Dell filed a motion to dismiss Sisvel’s First Amended Complaint pursuant to Rule 12(b)(6). (D.I. 12). On February 7, 2020, in four related cases pending in this District, Judge Noreika granted without prejudice motions to dismiss pursuant to Rule 12(b)(6) and permitted Sisvel to file amended complaints within 21 days. *See, e.g., Sisvel International S.A. v. Cradlepoint, Inc.*, C.A. No. 19-1142-MN, *Sisvel International S.A. v. Honeywell International, Inc.*, C.A. No. 19-1143-MN, *Sisvel International S.A. v. Verifone Systems, Inc.*, C.A. No. 19-1144-MN, *Sisvel International S.A. v. Xirgo Technologies, LLC*, C.A. No. 19-1145-MN. This Court issued an order instructing the parties to file a Status Report indicating whether the parties in this action would object to the entry of an order equivalent to Judge Noreika’s in this case related to Dell’s pending motion (D.I. 12).

Following a meet and confer, the parties agree on the following proposed procedure for Sisvel’s filing of an amended complaint, subject the Court’s approval. First, Sisvel will submit a

proposed amended complaint to Dell on or before March 13, 2020. Dell will then notify Sisvel whether it has any objection to the proposed amended complaint, and the parties will meet and confer in an attempt to reach an agreement on the filing of the amended complaint. On or before March 27, 2020, the parties will notify the Court regarding the status of the parties' discussions including whether there is any dispute remaining regarding the filing of an amended complaint and Dell's motion to dismiss.

Dated: February 21, 2020

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