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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

BLACKBERRY LIMITED, a
Canadian corporation,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware
corporation, WHATSAPP INC., a
Delaware corporation, and
INSTAGRAM, LLC, a Delaware
limited liability company

Defendants.

CASE NO. 2:18-cv-01844
GW(KSx)

**BLACKBERRY'S OPPOSITION
TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT
AND MOTION TO STRIKE**

Hearing Date: February 20, 2020
Time: 8:30 A.M.
Judge: Hon. George H. Wu
Courtroom: 9D

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Case No. 2:18-cv-01844 GW(KSx)

BLACKBERRY'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT & MOTION TO STRIKE

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6		1. <i>Defendants' summary judgment motion is based on an untimely non-infringement theory that should be excluded.</i>	
7		2. <i>Defendants' non-infringement theory is irrelevant and should be denied because it ignores BlackBerry's infringement theories.</i>	
8		3. <i>BlackBerry did not attempt to change its infringement theory and thus Dr. Rubin's clarification should not be stricken.</i>	
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