

**U.S. District Court  
District of Delaware (Wilmington)  
CIVIL DOCKET FOR CASE #: 1:24-cv-00173-JCB**

BrodTi Inc. v. Google LLC  
Assigned to: Judge John Campbell Barker  
Cause: 35:271 Patent Infringement

Date Filed: 02/09/2024  
Jury Demand: Plaintiff  
Nature of Suit: 830 Patent  
Jurisdiction: Federal Question

**Plaintiff**

**BrodTi Inc.**

represented by **Steven J. Balick**  
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V.

**Defendant**

**Google LLC**

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| Date Filed | #        | Docket Text                                                                                                                                                                                                                                                                                                                                                                            |
|------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 02/09/2024 | <u>1</u> | COMPLAINT with Jury Demand against Google LLC (Filing fee \$ 405, receipt number ADEDC-4334723) – filed by BrodTl Inc. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Civil Cover Sheet)(jfm) (Entered: 02/09/2024)                                                                                                                                                                    |
| 02/09/2024 | <u>2</u> | Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (jfm) (Entered: 02/09/2024)                                                                                                                                                                                                                                                                                 |
| 02/09/2024 | <u>3</u> | Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 11,416,898. (jfm) (Entered: 02/09/2024)                                                                                                                                                                                                                                                            |
| 02/09/2024 | <u>4</u> | Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by BrodTl Inc. (jfm) (Entered: 02/09/2024)                                                                                                                                                                                                                                                            |
| 02/09/2024 |          | No Summons Issued. (jfm) (Entered: 02/09/2024)                                                                                                                                                                                                                                                                                                                                         |
| 02/14/2024 |          | Case Assigned to Judge Richard G. Andrews. Please include the initials of the Judge (RGA) after the case number on all documents filed. (rjb) (Entered: 02/14/2024)                                                                                                                                                                                                                    |
| 05/01/2024 | <u>5</u> | SUMMONS Returned Executed by BrodTl Inc..Google LLC served on 5/1/2024, answer due 5/22/2024. (Mayo, Andrew) (Entered: 05/01/2024)                                                                                                                                                                                                                                                     |
| 05/07/2024 | <u>6</u> | STIPULATION and Proposed Order to Extend Deadline to Respond to Complaint – filed by Google LLC. (Egan, Brian) Modified on 5/8/2024 (nms). (Entered: 05/07/2024)                                                                                                                                                                                                                       |
| 05/08/2024 |          | SO ORDERED, re <u>6</u> STIPULATION and Proposed Order to Extend Deadline to Respond to Complaint (*Reset Answer Deadlines: Google LLC answer due 7/8/2024). Signed by Judge Richard G. Andrews on 5/8/2024. (nms) (Entered: 05/08/2024)                                                                                                                                               |
| 06/27/2024 | <u>7</u> | MOTION for Pro Hac Vice Appearance of Attorney Zachary M. Briers, Heather Takahashi, Matthew Miyamoto, Wendy Q. Xiao and J. Kain Day – filed by Google LLC. (Egan, Brian) (Entered: 06/27/2024)                                                                                                                                                                                        |
| 06/27/2024 | <u>8</u> | Pro Hac Vice Fee – Credit Card Payment received for Zachary M. Briers, Heather Takahashi, Matthew Miyamoto, Wendy Q. Xiao, and J. Kain Day. ( re <u>7</u> MOTION for Pro Hac Vice Appearance of Attorney Zachary M. Briers, Heather Takahashi, Matthew Miyamoto, Wendy Q. Xiao and J. Kain Day )( Payment of \$ 250, receipt number ADEDC-4439799).(Egan, Brian) (Entered: 06/27/2024) |
| 06/27/2024 |          | SO ORDERED, re <u>7</u> MOTION for Pro Hac Vice Appearance of Attorney Zachary M. Briers, Heather Takahashi, Matthew Miyamoto, Wendy Q. Xiao and J. Kain Day, filed by Google LLC. Signed by Judge Richard G. Andrews on 6/27/2024. (nms) (Entered: 06/27/2024)                                                                                                                        |

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| 07/08/2024 | <u>9</u>  | MOTION to Dismiss – filed by Google LLC. (Egan, Brian) Modified on 7/8/2024 (nms). (Entered: 07/08/2024)                                                                                                                                                                                                                            |
| 07/08/2024 | <u>10</u> | OPENING BRIEF in Support re <u>9</u> MOTION to Dismiss, filed by Google LLC. Answering Brief/Response due date per Local Rules is 7/22/2024. (Egan, Brian) Modified on 7/8/2024 (nms). (Entered: 07/08/2024)                                                                                                                        |
| 07/08/2024 | <u>11</u> | DECLARATION of J. Kain Day re <u>10</u> Opening Brief in Support, by Google LLC. (Attachments: # <u>1</u> Exhibits 1–6)(Egan, Brian) Modified on 7/8/2024 (nms). (Entered: 07/08/2024)                                                                                                                                              |
| 07/08/2024 | <u>12</u> | Disclosure Statement pursuant to Rule 7.1: identifying Corporate Parent Alphabet Inc., Other Affiliate XXVI Holdings, Inc. for Google LLC filed by Google LLC. (Egan, Brian) (Entered: 07/08/2024)                                                                                                                                  |
| 07/10/2024 |           | Pro Hac Vice Attorney Zachary M. Briers,Matthew Miyamoto,Wendy Xiao,Heather E. Takahashi, and J. Kain Day for Google LLC added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (oam) (Entered: 07/10/2024)            |
| 07/19/2024 | <u>13</u> | STIPULATION and Proposed Order to Extend Time – filed by BrodTl Inc.. (Mayo, Andrew) Modified on 7/19/2024 (lah). (Entered: 07/19/2024)                                                                                                                                                                                             |
| 07/19/2024 |           | SO ORDERED granting <u>13</u> STIPULATION and Proposed Order to Extend Time. (*Reset Briefing Schedule: re <u>9</u> MOTION to Dismiss. Answering Brief due 8/21/2024). Signed by Judge Richard G. Andrews on 7/19/2024. (lah) (Entered: 07/19/2024)                                                                                 |
| 08/01/2024 |           | Case Reassigned to District Judge John Campbell Barker of the United States District Court for the Eastern District of Texas. Please include the initials of the Judge (JCB) after the case number on all documents filed. (rjb) (Entered: 08/01/2024)                                                                              |
| 08/20/2024 | <u>14</u> | Unopposed MOTION for Extension of Time to <i>file a response to Defendant's motion to dismiss (D.I. 9)</i> – filed by BrodTl Inc.. (Mayo, Andrew) (Main Document 14 replaced on 8/21/2024) (cdd). (Entered: 08/20/2024)                                                                                                             |
| 08/21/2024 |           | CORRECTING ENTRY: Per counsel's request, the main document of D.I. <u>14</u> has been replaced to reflect the correct presiding judge. (cdd) (Entered: 08/21/2024)                                                                                                                                                                  |
| 08/22/2024 | <u>15</u> | ORDER: The Unopposed MOTION for Extension of Time (D.I. <u>14</u> ) is GRANTED. Plaintiff shall respond to Defendant's Motion to Dismiss (D.I. <u>9</u> ) by September 6, 2024. Signed by District Judge John Campbell Barker on 8/22/2024. (mpb) (Entered: 08/22/2024)                                                             |
| 09/06/2024 | <u>16</u> | STIPULATION extending plaintiff's deadline to respond to defendant's motion to dismiss, by BrodTl Inc.. (Mayo, Andrew) (Entered: 09/06/2024)                                                                                                                                                                                        |
| 09/13/2024 | <u>17</u> | MOTION for Pro Hac Vice Appearance of Attorney Robert P. Greenspoon, William W. Flachsbart, and Mark Magas – filed by BrodTl Inc.. (Mayo, Andrew) (Entered: 09/13/2024)                                                                                                                                                             |
| 09/13/2024 | <u>18</u> | Pro Hac Vice Fee – Credit Card Payment received for Robert P. Greenspoon, William W. Flachsbart, and Mark Magas. ( re <u>17</u> MOTION for Pro Hac Vice Appearance of Attorney Robert P. Greenspoon, William W. Flachsbart, and Mark Magas )( Payment of \$ 150, receipt number ADEDC-4497779).(Mayo, Andrew) (Entered: 09/13/2024) |
| 09/13/2024 | <u>19</u> | AMENDED COMPLAINT against Google LLC– filed by BrodTl Inc.. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G)(Mayo, Andrew) (Entered: 09/13/2024)                                                             |
| 09/17/2024 |           | SO ORDERED, re <u>17</u> MOTION for Pro Hac Vice Appearance of Attorneys Robert P. Greenspoon, William W. Flachsbart, and Mark Magas, filed by BrodTl Inc. Ordered by District Judge J. Campbell Barker on 9/17/2024. (oam) (Entered: 09/17/2024)                                                                                   |
| 09/17/2024 |           | Pro Hac Vice Attorney Mark A. Magas for BrodTl Inc. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mws) (Entered: 09/17/2024)                                                                                 |

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| 09/17/2024 | <u>20</u> | STIPULATION TO EXTEND TIME for Defendant to respond to the Amended Complaint (D.I. 19) to October 11, 2024 – filed by Google LLC. (Egan, Brian) (Entered: 09/17/2024)                                                                                                               |
| 09/18/2024 |           | Pro Hac Vice Attorney Robert P. Greenspoon and William W. Flachsbart for BrodT Inc. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mws) (Entered: 09/18/2024) |
| 09/25/2024 | <u>21</u> | SO ORDERED, re <u>20</u> STIPULATION TO EXTEND TIME for Defendant to respond to the Amended Complaint <u>19</u> to October 11, 2024. Ordered by District Judge J. Campbell Barker on 9/25/2024 (jfm) (Entered: 09/25/2024)                                                          |
| 10/11/2024 | <u>22</u> | MOTION to Dismiss for Failure to State a Claim – filed by Google LLC. (Egan, Brian) (Entered: 10/11/2024)                                                                                                                                                                           |
| 10/11/2024 | <u>23</u> | OPENING BRIEF in Support re <u>22</u> MOTION to Dismiss for Failure to State a Claim filed by Google LLC. Answering Brief/Response due date per Local Rules is 10/25/2024. (Egan, Brian) (Entered: 10/11/2024)                                                                      |
| 10/11/2024 | <u>24</u> | DECLARATION re <u>22</u> MOTION to Dismiss for Failure to State a Claim -- <i>Declaration of J. Kain Day</i> -- by Google LLC. (Attachments: # <u>1</u> Exhibits 1–4)(Egan, Brian) (Entered: 10/11/2024)                                                                            |
| 10/15/2024 | <u>25</u> | MOTION to Transfer Case to Northern District of California – filed by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                                                                                               |
| 10/15/2024 | <u>26</u> | OPENING BRIEF in Support re <u>25</u> MOTION to Transfer Case to Northern District of California filed by Google LLC. Answering Brief/Response due date per Local Rules is 10/29/2024. (Egan, Brian) (Entered: 10/15/2024)                                                          |
| 10/15/2024 | <u>27</u> | DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Bishnu Bhattacharyya</i> -- by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                             |
| 10/15/2024 | <u>28</u> | DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Konstantinos Symeonidis</i> -- by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                          |
| 10/15/2024 | <u>29</u> | DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Heather E. Takahashi</i> -- by Google LLC. (Attachments: # <u>1</u> Exhibits 1–10)(Egan, Brian) (Entered: 10/15/2024)                                                      |
| 10/15/2024 | <u>30</u> | [SEALED] DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Tal Akabas</i> -- by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                              |
| 10/15/2024 | <u>31</u> | [SEALED] DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Vikas Bansal</i> -- by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                            |
| 10/15/2024 | <u>32</u> | [SEALED] DECLARATION re <u>25</u> MOTION to Transfer Case to Northern District of California -- <i>Declaration of Anjani Gupta</i> -- by Google LLC. (Egan, Brian) (Entered: 10/15/2024)                                                                                            |
| 10/15/2024 | <u>33</u> | Unopposed MOTION to Seal <i>Portions of Certain Employee Declarations Filed in Support of Google's Motion to Transfer</i> – filed by Google LLC. (Attachments: # <u>1</u> Exhibits 1–3)(Egan, Brian) (Entered: 10/15/2024)                                                          |
| 10/21/2024 | <u>34</u> | REDACTED VERSION of <u>30</u> Declaration by Google LLC. (Egan, Brian) (Entered: 10/21/2024)                                                                                                                                                                                        |
| 10/21/2024 | <u>35</u> | REDACTED VERSION of <u>31</u> Declaration by Google LLC. (Egan, Brian) (Entered: 10/21/2024)                                                                                                                                                                                        |
| 10/21/2024 | <u>36</u> | REDACTED VERSION of <u>32</u> Declaration by Google LLC. (Egan, Brian) (Entered: 10/21/2024)                                                                                                                                                                                        |
| 10/24/2024 | <u>37</u> | STIPULATION to extend deadlines for briefing schedules in connection with motion to dismiss and motion to transfer by BrodT Inc.. (Mayo, Andrew) (Entered: 10/24/2024)                                                                                                              |

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|            |           | 10/24/2024)                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10/28/2024 | <u>38</u> | ORDER: SO ORDERED, re <u>37</u> stipulation to extend deadlines for briefing schedules. Plaintiff's response to the motion to transfer is due 11/12/2024. Defendant's reply is due 12/3/2024. Plaintiff's response to the motion to dismiss is due 11/8/2024. Defendant's reply is due 11/22/2024. Ordered by District Judge J. Campbell Barker on 10/28/2024.. Ordered by District Judge John Campbell Barker on 10/28/2024. (jfm) (Entered: 10/28/2024)                   |
| 11/08/2024 | <u>39</u> | ANSWERING BRIEF in Opposition re <u>22</u> MOTION to Dismiss for Failure to State a Claim filed by BrodTi Inc..Reply Brief due date per Local Rules is 11/15/2024. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Mayo, Andrew) (Entered: 11/08/2024)                                                                                                                                                                                                            |
| 11/12/2024 | <u>40</u> | ANSWERING BRIEF in Opposition re <u>25</u> MOTION to Transfer Case to Northern District of California filed by BrodTi Inc..Reply Brief due date per Local Rules is 11/19/2024. (Mayo, Andrew) (Entered: 11/12/2024)                                                                                                                                                                                                                                                         |
| 11/12/2024 | <u>41</u> | DECLARATION re <u>40</u> Answering Brief in Opposition ( <i>of Mark A. Magas</i> ) by BrodTi Inc.. (Mayo, Andrew) (Entered: 11/12/2024)                                                                                                                                                                                                                                                                                                                                     |
| 11/12/2024 | <u>42</u> | DECLARATION re <u>40</u> Answering Brief in Opposition ( <i>of John DeTitta</i> ) by BrodTi Inc.. (Mayo, Andrew) (Entered: 11/12/2024)                                                                                                                                                                                                                                                                                                                                      |
| 11/22/2024 | <u>43</u> | REPLY BRIEF re <u>22</u> MOTION to Dismiss for Failure to State a Claim filed by Google LLC. (Egan, Brian) (Entered: 11/22/2024)                                                                                                                                                                                                                                                                                                                                            |
| 12/03/2024 | <u>44</u> | REPLY BRIEF re <u>25</u> MOTION to Transfer Case to Northern District of California filed by Google LLC. (Egan, Brian) (Entered: 12/03/2024)                                                                                                                                                                                                                                                                                                                                |
| 12/03/2024 | <u>45</u> | DECLARATION re <u>44</u> Reply Brief -- <i>Declaration of Heather E. Takahashi</i> -- by Google LLC. (Attachments: # <u>1</u> Exhibit 11)(Egan, Brian) (Entered: 12/03/2024)                                                                                                                                                                                                                                                                                                |
| 12/03/2024 | <u>46</u> | DECLARATION re <u>44</u> Reply Brief -- <i>Declaration of Stacy Savides</i> -- by Google LLC. (Egan, Brian) (Entered: 12/03/2024)                                                                                                                                                                                                                                                                                                                                           |
| 01/27/2025 | <u>47</u> | ORAL ORDER: Defendant's first motion to dismiss (Doc. <u>9</u> ) is dismissed as moot in light of plaintiff's amended complaint (Doc. <u>19</u> ) and defendant's motion to dismiss the amended complaint (Doc. <u>22</u> ). Ordered by Judge John Campbell Barker on 1/27/2025. (jfm) (Entered: 01/27/2025)                                                                                                                                                                |
| 02/20/2025 | <u>48</u> | ORDER: Now before the court are two opposed motions: defendant's motion to transfer (Doc. <u>25</u> ) and motion to dismiss the amended complaint (Doc. <u>22</u> ). The court sets a hearing on these motions for August 6, 2025, at 3:00 p.m. Eastern Time. Proceedings will occur at the federal courthouse in Wilmington, Delaware. The court will confirm the courtroom by later order.Signed by Judge John Campbell Barker on 02/20/2025. (oam) (Entered: 02/20/2025) |
| 03/28/2025 | <u>49</u> | NOTICE OF SUBSTITUTION OF COUNSEL re BrodTi Inc.: Entry of appearance of attorney Andrew Colin Mayo. Attorney Steven J. Balick of Ashby & Geddes and Robert P. Greenspoon, William W. Flachsbart, and Mark Magas of Dunlap Bennett & Ludwig terminated. (Mayo, Andrew) (Entered: 03/28/2025)                                                                                                                                                                                |
| 04/29/2025 | <u>50</u> | NOTICE OF COURTROOM: The hearing set for August 6, 2025, at 3:00 p.m. EDT will occur in courtroom 6A of the federal courthouse in Wilmington, Delaware. Signed by Judge John Campbell Barker on 04/29/2025. (jfm) (Entered: 04/29/2025)                                                                                                                                                                                                                                     |
| 05/15/2025 | <u>51</u> | Standing Order Regulating Practice in Delaware Cases. Signed by Judge John Campbell Barker on 05/15/2025. (jfm) (Entered: 05/15/2025)                                                                                                                                                                                                                                                                                                                                       |