IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRAGMATUS TELECOM, LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 12-1684-RGA
v.	)	
	)	
REED ELSEVIER US HOLDINGS INC.,	)	
	)	
Defendant.	)	

DEFENDANT REED ELSEVIER US HOLDINGS INC.'S MOTION TO STAY PENDING REEXAMINATION OF THE PATENTS-IN-SUIT

Defendant Reed Elsevier U.S. Holdings Inc. ("Reed Elsevier") moves to stay this case pending the ex parte reexamination of U.S. Patent No. 6,311,231 (Control No. 90/012,617) and the inter partes reexamination of U.S. Patent No. 6,668,286 (Control No. 95/002,317). Reed Elsevier joins in and incorporates the arguments set forth in the briefs filed by defendants HSN, Inc. (C.A. No. 12-1546, D.I. 10) and Bosch Security Systems Inc. (C.A. No. 12-1650, D.I. 10).[1]

Plaintiff Pragmatus Telecom, LLC has alleged that Reed Elsevier, HSN, Inc. and Bosch Security Systems each "infringe directly one or more claims of" U.S. Patent Nos. 6,311,231 and 6,668,286. See D.I. 9, ¶¶ 10, 13; C.A. No. 12-1546, D.I. 1 ¶¶ 10, 13; C.A. No. 12-1650, D.I. 10 ¶¶ 10, 13.

[1] A motion to stay tolls the time for Reed Elsevier to respond to the Amended Complaint. *See, e.g., Intravascular Research Ltd. v. Endosonics Corp.*, 994 F. Supp. 564, 567 n.3 (D. Del. 1998) ("Historically, motions to stay have been recognized as tolling the time period for answering a complaint because pre-answer consideration of these motions have been found to maximize the effective utilization of judicial resources."); see also 5C Wright & Miller, FEDERAL PRACTICE AND PROCEDURE § 1360, 86 (3d ed. 2004).

Respectfully submitted,

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Dated: February 25, 2013
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on February 25, 2013, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on February 25, 2013, the attached document was Electronically Mailed to the following person(s):

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