IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CLOUDING IP, LLC, Plaintiff, v. DROPBOX, INC., Defendant.	C.A. No. 13-1454-LPS

PLAINTIFF CLOUDING IP, LLC'S OPPOSITION TO
DEFENDANT'S MOTION TO BIFURCATE

Defendant Dropbox, Inc. ("Defendant") has joined with defendants in the related cases *Clouding IP, LLC v. Google Inc.*, C.A. No. 12-639-LPS, *Clouding IP, LLC v. Motorola Mobility LLC*, C.A. No. 12-1078-LPS, *Clouding IP, LLC v. Amazon.com, Inc. et al.*, C.A. No. 12-0641-LPS, and *Clouding IP, LLC v. Rackspace Hosting Inc. et al.*, C.A. No. 12-675-LPS to Bifurcate Damages from Liability and to Stay Damages-Related Fact and Expert Discovery.

For the convenience of the Court and to reduce burden on the Court, Clouding IP, LLC ("Clouding") incorporates by reference the briefs in opposition to each of the motions to bifurcate. (C.A. No. 12-639-LPS at D.I. 122, C.A. No. 12-1078-111, C.A. No. 12-0641-LPS at D.I. 133, and C.A. No. 12-675-LPS at D.I. 138.) The additional facts provided by Defendant do not change the calculus for denying the request for bifurcation of damages and liability discovery.

January 6, 2014

BAYARD, P.A.

/s/ Stephen B. Brauerman (sb4952)

Richard D. Kirk (rk0922)
Stephen B. Brauerman (sb4952)
Vanessa R. Tiradentes (vt5398)
Sara E. Bussiere (sb5725)
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
(302) 655-5000
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com
vtiradentes@ bayardlaw.com
sbussiere@bayardlaw.com

Attorneys for Plaintiff Clouding IP, LLC

OF COUNSEL:

Marc A. Fenster
Brian D. Ledahl
Dorian S. Berger
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
mfenster@raklaw.com
bledahl@raklaw.com
dberger@raklaw.com