

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

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendants/Counterclaimant.	)	

**ROSS INTELLIGENCE INC.’S MOTION FOR SUMMARY JUDGMENT ON ITS  
AFFIRMATIVE DEFENSE OF FAIR USE**

Defendant and Counterclaimant ROSS Intelligence Inc. (“ROSS”) respectfully moves, pursuant to Federal Rule of Civil Procedure 56(a), for summary judgment on Count I of Plaintiffs’ Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation’s Complaint (D.I. 1). The grounds in support of this motion are set forth in ROSS’s accompanying brief.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Gabriel M. Ramsey  
Warrington Parker  
Joachim B. Steinberg  
Jacob Canter  
Christopher J. Banks  
CROWELL & MORING LLP  
3 Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
Tel: (415) 986-2800

Mark A. Klapow  
Crinesha B. Berry  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: (202) 624-2500

Dated: December 22, 2022  
10508129 / 20516.00001

By: /s/ David E. Moore

David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)

*Attorneys for Defendant/Counterclaimant  
ROSS Intelligence, Inc.*