

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---------------------------------|---|----------------------|
| THOMSON REUTERS ENTERPRISE |) | |
| CENTRE GMBH and WEST PUBLISHING |) | |
| CORPORATION, |) | |
| |) | |
| Plaintiffs and |) | |
| Counterdefendants, |) | C.A. No. 20-613 (SB) |
| |) | |
| v. |) | |
| |) | |
| ROSS INTELLIGENCE INC., |) | |
| |) | |
| Defendant and |) | |
| Counterclaimant. |) | |

**PLAINTIFFS’ RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT
ON DIRECT COPYRIGHT INFRINGEMENT AND RELATED DEFENSES**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, “Plaintiffs”) respectfully move for entry of partial summary judgment in favor of Plaintiffs on their direct copyright infringement claim against Defendant ROSS Intelligence Inc. (“ROSS”), as well as ROSS’s defenses of merger, scènes à faire, innocent infringement, and copyright misuse.

The grounds for this motion are set forth in Plaintiffs’ opening brief and supporting exhibits and declarations, filed concurrently. A proposed order is attached.

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October 1, 2024

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| Defendant and |) | |
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[PROPOSED] ORDER

This Court, having considered Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation’s (collectively, “Plaintiffs”) Renewed Motion for Partial Summary Judgment on Plaintiffs’ direct copyright infringement claim against Defendant ROSS Intelligence Inc. (“ROSS”), as well as ROSS’s defenses of merger, scènes à faire, innocent infringement, and copyright misuse.

IT IS HEREBY ORDERED this ____ day of _____ 202__ that Plaintiffs’ Motion for Partial Summary Judgment on Plaintiffs’ direct copyright infringement claim and on ROSS’s defenses of merger, scènes à faire, innocent infringement, and copyright misuse is **GRANTED**.

Dated: _____

The Honorable Stephanos Bibas

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 1, 2024, upon the following in the manner indicated:

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