

**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,)	JURY TRIAL DEMANDED
)	
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
)	
Defendant/Counterclaimant.)	

**ROSS INTELLIGENCE INC.'S MOTION FOR CERTIFICATION FOR
INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(B)
AND FOR STAY PENDING APPEAL**

Defendant and Counterclaimant ROSS Intelligence Inc. respectfully moves, pursuant to 28 U.S.C. § 1292(b), for certification of the Court's Order dated February 11, 2025 (D.I. 770), for interlocutory appeal and for a stay pending that appeal. The grounds in support of this motion are set forth in ROSS's accompanying brief.

Pursuant to D. Del. LR 7.1.1, the subject of this motion was raised with counsel for Plaintiffs during a telephonic meet and confer that included Delaware counsel for all parties, and the parties were not able to reach agreement.

OF COUNSEL:

Warrington S. Parker III
Joachim B. Steinberg
Jacob Canter
CROWELL & MORING LLP
3 Embarcadero Ctr., 26th Floor
San Francisco, CA 94111
Tel: (415) 986-2800

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

Andy LeGolvan
WHITE & CASE LLP
3000 El Camino Real
2 Palo Alto Square
Suite 900
Palo Alto, CA 94306
Tel: (213) 620-7755

Mark S. Davies
Anna B. Naydonov
Kufere Laing
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005
Tel: (202) 626-3600

Taylor Moore-Willis
Rosie Norwood-Kelly
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020
Tel: (212) 819-8200

Dated: March 18, 2025
12120273 / 20516.00001

Respectfully submitted,
POTTER ANDERSON & CORROON LLP

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

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