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PayPal, Inc., RetailMeNot, Inc.,
7 **Shopify (USA) Inc., Shopify, Inc., Strava, Inc.,**
Upwork Global Inc. and
8 **Valassis Communications, Inc.**

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 IN RE: PERSONALWEB TECHNOLOGIES,
LLC, ET AL., PATENT LITIGATION

14

PERSONALWEB TECHNOLOGIES, LLC, a
15 Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
16 liability company,

17 Plaintiffs,

18 v.

19 PAYPAL, INC., a Delaware corporation,

20 Defendant.

21

PERSONALWEB TECHNOLOGIES, LLC, a
22 Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
23 liability company,

24 Plaintiffs,

25 v.

26 SHOPIFY INC., a Canadian corporation, and
SHOPIFY (USA) INC., a Delaware corporation,

27 Defendants.

28 NOTICE TO COURT REGARDING *INTER*
PARTES REVIEW OF ASSERTED CLAIMS

Case No. 5:18-md-02834-BLF

Case No.: 5:18-cv-00177-BLF
Case No.: 5:18-cv-04626-BLF
Case No.: 5:18-cv-04627-BLF
Case No.: 5:18-cv-05206-BLF
Case No.: 5:18-cv-05373-BLF
Case No.: 5:18-cv-05624-BLF
Case No.: 5:18-cv-05966-BLF

NOTICE TO COURT REGARDING *INTER*
***PARTES* REVIEW OF ASSERTED CLAIMS**

Hon. Beth Labson Freeman

5:18-md-02834-BLF; 5:18-cv-00177-BLF;
5:18-cv-04626-BLF; 5:18-cv-04627-BLF;
5:18-cv-05206-BLF; 5:18-cv-05373-BLF;
5:18-cv-05624-BLF; 5:18-cv-05966-BLF

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2 PERSONALWEB TECHNOLOGIES, LLC, a
3 Texas limited liability company, and LEVEL 3
4 COMMUNICATIONS, LLC, a Delaware limited
liability company,

Plaintiffs,

v.

6 STRAVA, INC., a Delaware corporation,

7 Defendant.

8 PERSONALWEB TECHNOLOGIES, LLC, a
9 Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
liability company,

10 Plaintiffs,

v.

12 VALASSIS COMMUNICATIONS, INC., a
Delaware corporation,

13 Defendant.

14 PERSONALWEB TECHNOLOGIES, LLC, a
15 Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
liability company,

16 Plaintiffs,

v.

18 DOLLAR SHAVE CLUB, INC., a Delaware
corporation,

19 Defendant.

20 PERSONALWEB TECHNOLOGIES, LLC, a
21 Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
liability company,

22 Plaintiffs,

v.

24 UPWORK GLOBAL INC., a California
corporation,

25 Defendant.

27 NOTICE TO COURT REGARDING *INTER*
28 *PARTES* REVIEW OF ASSERTED CLAIMS

5:18-md-02834-BLF; 5:18-cv-00177-BLF;
5:18-cv-04626-BLF; 5:18-cv-04627-BLF;
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5:18-cv-05624-BLF; 5:18-cv-05966-BLF

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PERSONALWEB TECHNOLOGIES, LLC, a
Texas limited liability company, and LEVEL 3
COMMUNICATIONS, LLC, a Delaware limited
liability company,

Plaintiffs,

v.

RETAILMENOT, INC., a Delaware corporation,

Defendants.

NOTICE TO COURT REGARDING *INTER*
PARTES REVIEW OF ASSERTED CLAIMS

5:18-md-02834-BLF; 5:18-cv-00177-BLF;
5:18-cv-04626-BLF; 5:18-cv-04627-BLF;
5:18-cv-05206-BLF; 5:18-cv-05373-BLF;
5:18-cv-05624-BLF; 5:18-cv-05966-BLF

NOTICE TO COURT REGARDING *INTER PARTES* REVIEW REVIEW PETITIONS
COVERING ALL ASSERTED CLAIMS

Defendants Dollar Shave Club, Inc., PayPal, Inc., RetailMeNot, Inc., Shopify (USA), Inc., Shopify, Inc., Strava, Inc., Upwork Global Inc. and Valassis Communications, Inc. (“Defendants”) wish to inform the court of five *inter partes* review (IPR) petitions recently filed before the U.S. Patent Trial and Appeal Board (“PTAB”):

PayPal, Inc. et al. v. PersonalWeb Technologies, LLC et al., IPR2019-01089 (May 14, 2019) - challenging claims 1, 13, 25-27, 29-30, 32, 34-36 and 166 of U.S. Patent No. 8,099,420;

PayPal, Inc. et al. v. PersonalWeb Technologies, LLC et al., IPR2019-01091 (May 14, 2019) - challenging claims 1, 13, 25-27, 29-30, 32, 34-36 and 166 of U.S. Patent No. 8,099,420;

PayPal, Inc. et al. v. PersonalWeb Technologies, LLC et al., IPR2019-01092 (May 14, 2019) - challenging claims 10 and 11 of U.S. Patent No. 6,928,442;

PayPal, Inc. et al. v. PersonalWeb Technologies, LLC et al., IPR2019-01093 (May 14, 2019) - challenging claims 46, 48, 52 and 55 of U.S. Patent No. 7,945,544; and

PayPal, Inc. et al. v. PersonalWeb Technologies, LLC et al., IPR2019-01111 (May 20, 2019) - challenging claims 20 and 69 of U.S. Patent No. 7,802,310.

These IPR petitions cover all patent claims asserted by Plaintiffs in their complaints in these MDL proceedings. The PTAB has not yet taken action in any of the above proceedings.

Should the Court have any questions, counsel for the Defendants would be pleased to address any such questions or address any related issues at the upcoming *Markman* hearing on May 24, or at the Court’s convenience thereafter.

1 Dated: May 23, 2019

Respectfully submitted,

2 /s/ Brent P. Ray

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15 *and Valassis Communications, Inc.*

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28 *PARTES* REVIEW OF ASSERTED CLAIMS

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5:18-cv-05206-BLF; 5:18-cv-05373-BLF;

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