

From: Vic Hayes - TBM <V.Hayes@tudelft.nl>
Sent: Sunday, November 24, 2013 9:32 AM
To: Cardy, Dan <CardyD@dicksteinshapiro.com>
Cc: Haddad, Gerard <HaddadG@dicksteinshapiro.com>
Subject: RE: Drafts of the 802.11 standard

Dear Mr. Cardy,

The IEEE-SA is the only one that can provide the draft standard, as far as I have understood their policy. If they do not have the password, they could ask the current Chair of IEEE 802.11 for them.

If that does not work, they could give me permission to disclose the password to you. However, I need to search the passwords on my back-ups as I have had three laptop thefts in a row.

Sorry, I am not available for any conversation.

Kind regards,

Vic Hayes

Van: Cardy, Dan [CardyD@dicksteinshapiro.com]
Verzonden: donderdag 21 november 2013 21:08
Aan: Vic Hayes - TBM
CC: Haddad, Gerard
Onderwerp: Drafts of the 802.11 standard

Dear Mr. Hayes,

We represent Samsung in a lawsuit in which a patent holding company (which makes no products) has asserted that technology companies infringe its patents whenever they follow certain IEEE wireless communications standards. The technology in the patents is not new. We believe that the IEEE 802.11 working group that you chaired invented the technology first.

We may need a copy of one of the drafts of the 802.11 standard that was circulated before the June 26, 1997 date that the standard was adopted. We know there were several drafts of the 802.11 standard that were circulated before June 1997, but we have been unable to obtain them. For example, it appears that some drafts are located on the IEEE website, but they are in password-protected zip files for which we (and the IEEE) do not know the password.

Would you happen to have a copy of any of the drafts of the 802.11 standard, or can you direct us to someone else who might have copies (or who might know the password to the zip files on the IEEE web site)?

In addition, if you have time for a short conversation by telephone, we would appreciate speaking with you.

Thanks in advance for any help you can provide. Please feel free to contact me by phone or e-mail.

Best regards,

Dan Cardy
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