

## Jonathan Pearce

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**From:** Rich Giunta [Rich.Giunta@WolfGreenfield.com]  
**Sent:** Wednesday, December 23, 2015 1:00 PM  
**To:** Jonathan Pearce; Elisabeth H. Hunt  
**Cc:** Kala Sarvaiya  
**Subject:** RE: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Jonathan,

Thank you for your email. RPX has no problem with AIT filing the redacted and unredacted versions as Board and Parties Only and appreciates the Board's suggestion that AIT file in this manner to allow RPX a chance to review the redacted filings before they are made accessible to the public.

We are aware of the power outage at the Patent Office and appreciate AIT serving its papers on us via email when it mails or files its responses today.

Thanks,  
Rich

**Richard F. Giunta**  
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direct dial 617.646.8322

**Wolf Greenfield**  
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This e-mail message and any attachments may contain confidential or privileged information. If you are not the intended recipient, please notify me immediately by replying to this message and destroy all copies of this message and any attachments. Thank you.  
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**From:** Jonathan Pearce [mailto:jpearce@socalip.com]  
**Sent:** Wednesday, December 23, 2015 2:03 PM  
**To:** Hunt, Elisabeth  
**Cc:** Giunta, Rich; Kala Sarvaiya  
**Subject:** RE: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

AIT Exhibit 2030  
RPX v. AIT  
IPR2015-01751

Elisabeth,

Later today, AIT plans to file its sur-reply. AIT plans to file RPX000068-RPX000073 (designated as Exhibit 2025) and an Exhibit 2026 which is a spreadsheet including [REDACTED] derived from present Exhibit 2019. Both of these exhibits, the only new exhibits identified in AIT's sur-reply, will be designated PROTECTIVE ORDER MATERIAL. The new exhibits and the sur-reply itself will be the subject of a motion to seal and will be filed Board and Parties Only. Out of an abundance of caution, both the redacted and unredacted versions of our sur-reply also will be designated and filed as Board and Parties Only. Please let me know if any of this poses a problem for RPX.

As a bit of housekeeping, you may or may not be aware, but the Patent Office IT infrastructure suffered a major power outage yesterday that continues today. If it remains at the time we plan to file, we will be forced to file by express mail. We would plan to file as soon as possible thereafter if PRPS becomes available, but with the holidays so near, it is unclear what day or time that may be. Regardless, we will serve copies on RPX at the email addresses you have designated for service substantially simultaneously with our mailing (or filing) of the responses.

Regards,

/jonathan pearce/

Jonathan Pearce  
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**From:** Elisabeth H. Hunt [<mailto:Elisabeth.Hunt@WolfGreenfield.com>]  
**Sent:** Monday, December 21, 2015 2:10 PM  
**To:** Jonathan Pearce  
**Cc:** Rich Giunta; Kala Sarvaiya  
**Subject:** RE: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Jonathan,

The e-mail that I sent you below contained an attachment that was 15 MB in size. Just in case the large attachment size is a problem for your e-mail client, we also sent the attachment via LeapFILE transfer. If you are unable to receive or access the attachment from my earlier e-mail below, please access the file using the instructions in the e-mail from LeapFILE which you should already have received.

Regards,

Elisabeth Hunt  
Wolf, Greenfield & Sacks, P.C.  
(617) 646-8443 | (617) 646-8646 fax

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**From:** Hunt, Elisabeth  
**Sent:** Monday, December 21, 2015 4:49 PM  
**To:** 'Jonathan Pearce'  
**Cc:** Giunta, Rich; 'Kala Sarvaiya'  
**Subject:** RE: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Jonathan,

Further to our e-mail below, attached are copies of e-mail exchanges between AIT's counsel and RPX's counsel that will be filed today as exhibits to RPX's motion for sanctions. Of these, RPX plans to file those labeled as exhibits 1029, 1031-1033, 1035, 1038, 1039, 1042, and 1043 under seal. The other e-mail exhibits will be filed publicly unless you have objections.

RPX will also be filing copies of the declarations of Mr. Boebel and Mr. Knuettel under seal given that AIT designated them as "PROTECTIVE ORDER MATERIAL."

If these designations raise any issues for AIT, please let us know.

Regards,

Elisabeth Hunt  
Wolf, Greenfield & Sacks, P.C.  
(617) 646-8443 | (617) 646-8646 fax

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**From:** Hunt, Elisabeth  
**Sent:** Monday, December 21, 2015 10:31 AM  
**To:** 'Jonathan Pearce'  
**Cc:** Giunta, Rich; Kala Sarvaiya  
**Subject:** RE: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Jonathan,

Thank you for your reply. We understand AIT does not agree to the proposed revised protective order. RPX will be filing today its motion for sanctions, together with a motion to seal that document as well as some of its exhibits. Based on previous communications, absent notification to the contrary we will assume that AIT consents to RPX filing the motion to seal based on the original default protective order and will contest some of RPX's designations. If this is incorrect, please advise.

Regards,

Elisabeth Hunt  
Wolf, Greenfield & Sacks, P.C.  
(617) 646-8443 | (617) 646-8646 fax

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**From:** Jonathan Pearce [<mailto:jpearce@socalip.com>]  
**Sent:** Sunday, December 20, 2015 3:31 PM  
**To:** Hunt, Elisabeth  
**Cc:** Giunta, Rich; Kala Sarvaiya  
**Subject:** Re: RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Elisabeth,

Thank you for your email. AIT declines RPX's request for consent.

/jonathan pearce/

Jonathan Pearce

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**From:** "Elisabeth H. Hunt" <[Elisabeth.Hunt@WolfGreenfield.com](mailto:Elisabeth.Hunt@WolfGreenfield.com)>

**Date:** Friday, December 18, 2015 at 2:01 PM

**To:** Jonathan Pearce <[jpearce@socalip.com](mailto:jpearce@socalip.com)>, Kala Sarvaiya <[KSarvaiya@socalip.com](mailto:KSarvaiya@socalip.com)>

**Cc:** Rich Giunta <[Rich.Giunta@WolfGreenfield.com](mailto:Rich.Giunta@WolfGreenfield.com)>

**Subject:** RPX v AIT - Revised Protective Order (IPR2015-01750, IPR2015-01751, IPR2015-01752)

Counsel,

RPX will be requesting that the Board enter the attached revised protective order in each of the above-identified IPRs. Please indicate by reply whether AIT consents to this revised protective order.

Regards,

Elisabeth Hunt

Wolf, Greenfield & Sacks, P.C.

(617) 646-8443 | (617) 646-8646 fax