

From: [Steve Sereboff](#)
To: [Hunt, Elisabeth](#)
Cc: [Kala Sarvaiya](#); [Noelle Smith](#); [Giunta, Rich](#)
Subject: RE: RPX v AIT motions re RPX confidential information [A213.L15F15]
Date: Friday, November 27, 2015 2:01:07 PM

Elisabeth,

I hope you and Rich had a pleasant Thanksgiving holiday. We're filing our preliminary response in the '111 IPR later today.

To protect RPX's confidential information, as designated in your document production, we will be filing a motion to (a) seal the corresponding exhibits, (b) redact from the public version of our preliminary responses those portions of our preliminary responses which include confidential information as designated by RPX, and (c) enter the default protective order. Please let me know if you have any objection.

The exhibits we plan to seal are:

2018	RPX document production RPX000074-RPX000075
2019	RPX document production RPX000037
2022	RPX document production RPX000077-RPX000090

I apologize for this last-minute request. We are drafting the motion now and can provide a draft in about 1-2 hours.

/Steven C. Sereboff/
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From: Elisabeth H. Hunt [mailto:Elisabeth.Hunt@WolfGreenfield.com]
Sent: Tuesday, November 03, 2015 2:32 PM
To: Steve Sereboff
Cc: Kala Sarvaiya; Noelle Smith; Rich Giunta
Subject: RE: RPX v AIT additional discovery [A213.L15F15]

Steve,

Counsel for RPX will shortly be serving document production via LeapFILE transfer upon the e-mail address provided in AIT's Mandatory Notice Information (uspto@socalip.com). This production

will include confidential protective order material, and is intended for your access only, unless and until we receive signed acknowledgment of the protective order from any other individuals.

Regards,

Elisabeth Hunt

Wolf, Greenfield & Sacks, P.C.

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