

**From:** Frese, Bradford C. <Bradford.Frese@arentfox.com>  
**Sent:** Monday, May 02, 2016 2:35 PM  
**To:** Frank Calvosa  
**Cc:** Berman, Richard; Carlan, Janine; Matt Ruedy; Steve Maddox; Nick Cerrito; Eric Stops; Evangeline Shih; Gabriel Brier; Lyndsey Przybylski; John V Biernacki; David Cochran  
**Subject:** RE: IPR2015-01903

Frank,

Your proposal is acceptable to Petitioners. We do, however, reserve the right to depose any new individuals making declarations that Patent Owner submits with their response.

Best regards,  
Bradford

**Bradford C. Frese**  
Associate

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**From:** Frank Calvosa [mailto:FrankCalvosa@quinnemanuel.com]  
**Sent:** Monday, May 02, 2016 10:46 AM  
**To:** Frese, Bradford C. <Bradford.Frese@arentfox.com>  
**Cc:** Berman, Richard <Richard.Berman@arentfox.com>; Carlan, Janine <Janine.Carlan@arentfox.com>; Matt Ruedy <MRuedy@meiplaw.com>; Steve Maddox <smaddox@meiplaw.com>; Nick Cerrito <NickCerrito@quinnemanuel.com>; Eric Stops <EricStops@quinnemanuel.com>; Evangeline Shih <EvangelineShih@quinnemanuel.com>; Gabriel Brier <GabrielBrier@quinnemanuel.com>; Lyndsey Przybylski <lyndseyprzybylski@quinnemanuel.com>; John V Biernacki <jvbiernacki@JonesDay.com>; David Cochran <dcochran@JonesDay.com>  
**Subject:** Re: IPR2015-01903

Bradford,

Please provide a response by 3 pm today.

Thanks,

Frank

On Apr 27, 2016, at 11:04 PM, Frese, Bradford C. <[Bradford.Frese@arentfox.com](mailto:Bradford.Frese@arentfox.com)> wrote:

Frank:

We are considering Patent Owner's offer and will get back to you shortly.

Best regards

Bradford

**Bradford C. Frese**  
Associate

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**From:** Frank Calvosa [<mailto:FrankCalvosa@quinnemanuel.com>]  
**Sent:** Wednesday, April 27, 2016 5:52 PM  
**To:** Frese, Bradford C. <[Bradford.Frese@arentfox.com](mailto:Bradford.Frese@arentfox.com)>; Berman, Richard <[Richard.Berman@arentfox.com](mailto:Richard.Berman@arentfox.com)>; Carlan, Janine <[Janine.Carlan@arentfox.com](mailto:Janine.Carlan@arentfox.com)>; Matt Ruedy <[MRuedy@meiplaw.com](mailto:MRuedy@meiplaw.com)>; Steve Maddox <[smaddox@meiplaw.com](mailto:smaddox@meiplaw.com)>  
**Cc:** Nick Cerrito <[NickCerrito@quinnemanuel.com](mailto:NickCerrito@quinnemanuel.com)>; Eric Stops <[EricStops@quinnemanuel.com](mailto:EricStops@quinnemanuel.com)>; Evangeline Shih <[EvangelineShih@quinnemanuel.com](mailto:EvangelineShih@quinnemanuel.com)>; Gabriel Brier <[GabrielBrier@quinnemanuel.com](mailto:GabrielBrier@quinnemanuel.com)>; Lyndsey Przybylski <[lyndseyprzybylski@quinnemanuel.com](mailto:lyndseyprzybylski@quinnemanuel.com)>; John V Biernacki <[jvbiernacki@JonesDay.com](mailto:jvbiernacki@JonesDay.com)>; David Cochran <[dcochran@JonesDay.com](mailto:dcochran@JonesDay.com)>  
**Subject:** Re: IPR2015-01903

Counsel,

Please let us know whether you agree to Jazz's proposal in the email below. If not, please provide your availability for a call with the Board to further discuss this issue.

Regards,

Frank

On Apr 20, 2016, at 4:57 PM, Frank Calvosa <[FrankCalvosa@quinnemanuel.com](mailto:FrankCalvosa@quinnemanuel.com)> wrote:

Counsel,

The issues for the instituted claims in IPR2015-01903 (the "'963 IPR") and IPR2015-00545, -546, -547, -548, -551, -554 (the "REMS IPRs") are overlapping. In an effort to conserve the parties' resources, please let us know whether Petitioners agree to Patent Owner using Dr. Valuck's deposition testimony, from the REMS IPRs, in the '963 IPR. In exchange, Patent Owner will agree to forego Dr. Valuck's deposition in the '963 IPR, related to his opening declaration. Patent Owner will also agree that Dr. DiPiro's and Dr. Bergeron's deposition testimony from the REMS IPRs can be used in the '963 IPR, and that Patent Owner will rely only on Dr. DiPiro's and Dr. Bergeron's previously disclosed opinions from the REMS IPRs in the '963 IPR.

Please let us know your response by Tuesday, April 26.

Regards,

**Frank Calvosa**

*Associate*

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