

**From:** [Trials](#)  
**To:** [Steadman, Paul](#); [Trials](#); [Lambrianakos, Peter](#)  
**Cc:** [toyota@sughrue.com](#); [jmelnik@jonesday.com](#); [jbeauchamp@jonesday.com](#); [aliou@jonesday.com](#); [Satchwell, Matthew](#); [Minutoli, Gianni](#); [Panno, Nicholas J.](#); [Harel, Shahar](#); [Rubino, Vincent J.](#); [shsu@hdbdlaw.com](#); [shsu@jvllp.com](#); [Suzanne Konrad](#); [Michael Murphy](#); [Fabricant, Alfred R.](#); [Lambrianakos, Peter](#)  
**Subject:** RE: IPR2016-00418  
**Date:** Tuesday, January 31, 2017 4:25:51 PM

---

Counsel,

A conference call will not be scheduled at this time. For IPR2016-00418, the Hyundai and Kia Petitioners are authorized to file the requested motion to withdraw and joint motion to file the settlement agreement as business confidential information. In addition, the Hyundai and Kia Petitioners have the option, but are not required, to attend the oral argument.

The Board will respond to the Hyundai and Kia Petitioners' requests regarding IPR2016-01476 and IPR2016-01477 shortly.

Regards,

Andrew Kellogg,  
Supervisory Paralegal  
Patent Trial and Appeal Board  
USPTO  
[andrew.kellogg@uspto.gov](mailto:andrew.kellogg@uspto.gov)  
Direct: 571-272-5366

---

**From:** Steadman, Paul [mailto:Paul.Steadman@dlapiper.com]  
**Sent:** Tuesday, January 31, 2017 12:48 PM  
**To:** Trials <Trials@USPTO.GOV>; Lambrianakos, Peter <PLambrianakos@brownrudnick.com>  
**Cc:** [toyota@sughrue.com](#); [jmelnik@jonesday.com](#); [jbeauchamp@jonesday.com](#); [aliou@jonesday.com](#); [Satchwell, Matthew](#) <Matthew.Satchwell@dlapiper.com>; [Minutoli, Gianni](#) <Gianni.Minutoli@dlapiper.com>; [Panno, Nicholas J.](#) <Nicholas.Panno@dlapiper.com>; [Harel, Shahar](#) <SHarel@brownrudnick.com>; [Rubino, Vincent J.](#) <VRubino@brownrudnick.com>; [shsu@hdbdlaw.com](#); [shsu@jvllp.com](#); [Suzanne Konrad](#) <SKonrad@giplaw.com>; [Michael Murphy](#) <MMurphy@giplaw.com>; [Fabricant, Alfred R.](#) <AFabricant@brownrudnick.com>; [Lambrianakos, Peter](#) <PLambrianakos@brownrudnick.com>; [Steadman, Paul](#) <Paul.Steadman@dlapiper.com>  
**Subject:** RE: IPR2016-00418

Dear PTAB,

Petitioners Hyundai Motor Co. Ltd., Hyundai Motor America, Hyundai Motor Manufacturing Alabama, LLC, Kia Motors Corp., Kia Motors America, Inc., and Kia Motors Manufacturing Georgia, Inc. (on the one hand) and Patent Holder (on the other hand) have agreed to settle all of their disputes, including to request termination of all pending IPRs where Hyundai or Kia are petitioners, withdrawal of the Hyundai and Kia Petitioners from IPR2016-00418. IPR2016-00418 is currently scheduled for an oral hearing on February 2, 2017. Petitioners Honda and Nissan have joined IPR 2016-00418, and we have copied their counsel on this message.

We respectfully request a conference call to seek permission to file a joint motion to terminate IPR2016-01476 and IPR2016-01477 and for the Hyundai and Kia Petitioners to withdraw from IPR 2016-00418, as well as a joint motion to file the settlement agreement (upon its execution) as business confidential information. Counsel for Petitioner and Patent Owner are presently available and will make themselves

available at the Board's convenience. We have conferred with counsel for Patent Owner, who consents to our motions as described above.

Finally, in view of these developments, lead counsel for the Hyundai and Kia Petitioners request permission not to attend the oral hearing on February 2, 2017. In the alternative, if counsel for Hyundai and Kia Petitioners must attend, we request permission to substitute back-up counsel Mr. Gianni Minutoli to attend for the Hyundai and Kia Petitioners in lieu of lead counsel.

Respectfully submitted,

Paul R. Steadman  
Lead Counsel for Petitioners Hyundai Motor Co. Ltd., Hyundai Motor America, Hyundai Motor Manufacturing Alabama, LLC, Kia Motors Corp., Kia Motors America, Inc., and Kia Motors Manufacturing Georgia, Inc.

**Paul Steadman**

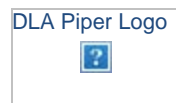
Partner

T +1 312.368.2135

F +1 312.251.2850

M +1 312.927.8135

E [paul.steadman@dlapiper.com](mailto:paul.steadman@dlapiper.com)



DLA Piper LLP (US)  
203 North LaSalle Street, Suite 1900  
Chicago, Illinois 60601-1293  
United States  
[www.dlapiper.com](http://www.dlapiper.com)

---

**From:** Trials [<mailto:Trials@USPTO.GOV>]  
**Sent:** Tuesday, January 31, 2017 9:42 AM  
**To:** Lambrianakos, Peter; Trials  
**Cc:** [toyota@sughrue.com](mailto:toyota@sughrue.com); [jmelnik@jonesday.com](mailto:jmelnik@jonesday.com); [jbeauchamp@jonesday.com](mailto:jbeauchamp@jonesday.com); [aliou@jonesday.com](mailto:aliou@jonesday.com); Steadman, Paul; Satchwell, Matthew; Minutoli, Gianni; Panno, Nicholas J.; Harel, Shahar; Rubino, Vincent J.; [shsu@hdbdlaw.com](mailto:shsu@hdbdlaw.com); [shsu@jvllp.com](mailto:shsu@jvllp.com); Suzanne Konrad; Michael Murphy; Fabricant, Alfred R.  
**Subject:** RE: IPR2016-00418

Counsel,

The panel appreciates the request for a conference call to discuss availability of lead counsel for Patent Owner at oral argument. We have noted the appearance by Mr. Vincent Rubino, and authorize his participation in lieu of lead counsel, Mr. Peter Lambrianakos. No conference call is necessary at this time.

Regards,

Andrew Kellogg,  
Supervisory Paralegal  
Patent Trial and Appeal Board  
USPTO  
[andrew.kellogg@uspto.gov](mailto:andrew.kellogg@uspto.gov)  
Direct: 571-272-5366

---

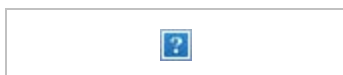
**From:** Lambrianakos, Peter [<mailto:PLambrianakos@brownrudnick.com>]  
**Sent:** Monday, January 30, 2017 9:59 PM  
**To:** Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>  
**Cc:** [toyota@sughrue.com](mailto:toyota@sughrue.com); [jmelnik@jonesday.com](mailto:jmelnik@jonesday.com); [jbeauchamp@jonesday.com](mailto:jbeauchamp@jonesday.com);  
[aliou@jonesday.com](mailto:aliou@jonesday.com); [paul.steadman@dlapiper.com](mailto:paul.steadman@dlapiper.com); [matthew.satchwell@dlapiper.com](mailto:matthew.satchwell@dlapiper.com);  
[Gianni.minutoli@dlapiper.com](mailto:Gianni.minutoli@dlapiper.com); [Nicholas.panno@dlapiper.com](mailto:Nicholas.panno@dlapiper.com); Lambrianakos, Peter  
<[PLambrianakos@brownrudnick.com](mailto:PLambrianakos@brownrudnick.com)>; Harel, Shahr <[SHarel@brownrudnick.com](mailto:SHarel@brownrudnick.com)>; Rubino,  
Vincent J. <[VRubino@brownrudnick.com](mailto:VRubino@brownrudnick.com)>; [shsu@hdbdlaw.com](mailto:shsu@hdbdlaw.com); [shsu@jvllp.com](mailto:shsu@jvllp.com); Suzanne Konrad  
<[SKonrad@giplaw.com](mailto:SKonrad@giplaw.com)>; Michael Murphy <[MMurphy@giplaw.com](mailto:MMurphy@giplaw.com)>; Fabricant, Alfred R.  
<[AFabricant@brownrudnick.com](mailto:AFabricant@brownrudnick.com)>  
**Subject:** IPR2016-00418

Board,

Pursuant to Paper No. 29, Order Granting Request for Oral Argument, Patent Owner requests a joint conference call to request that backup counsel for Patent Owner, Mr. Vincent Rubino, attend the Oral Argument in lieu of lead counsel. I have a conflict with a pretrial conference in the Eastern District of Texas on Wednesday, February 1, 2017, which conference was scheduled this afternoon.

Respectfully submitted,

Peter Lambrianakos  
Reg. No. 58,279



**Peter Lambrianakos**

Partner  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212.209.4813  
F: 212.938.2981  
[plambrianakos@brownrudnick.com](mailto:plambrianakos@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)

Please consider the environment before printing this e-mail

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

\*\*\*\*\*

Please consider the environment before printing this email.

The information contained in this email may be confidential and/or legally privileged. It has been sent for the sole use of the intended recipient(s). If the reader of this message is not an intended recipient, you are hereby notified that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please reply to the sender and destroy all copies of the message. To contact us directly, send to [postmaster@dlapiper.com](mailto:postmaster@dlapiper.com). Thank you.