

David Loewenstein

From: JCostakos@foley.com
Sent: Monday, June 20, 2016 5:03 PM
To: David Loewenstein
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; MMoran@foley.com; Milo Eadan
Subject: RE: Request for extension of due dates

Sorry for the delay. I'm trying to confirm. I can say this much: if we decide to take Mr. Savolainen's deposition, we can do it on the 7th in your office in New York.

-Jeff

From: David Loewenstein [mailto:DLoewenstein@PearlCohen.com]
Sent: Monday, June 20, 2016 4:01 PM
To: Costakos, Jeffrey N.
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; Moran, Michelle A.; Milo Eadan
Subject: RE: Request for extension of due dates

Jeff – I still don't have the courtesy of an answer regarding Mr. Savolainen's deposition. We, and he, need to know if the deposition is taking place on July 7th.
Thanks,
David

From: David Loewenstein
Sent: Thursday, June 16, 2016 2:36 PM
To: 'JCostakos@foley.com'
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; MMoran@foley.com; Milo Eadan
Subject: RE: Request for extension of due dates

Jeff – the stipulation is OK. Can you confirm the Savolainen deposition on July 7th at our office in New York.
Thanks,
David

From: JCostakos@foley.com [mailto:JCostakos@foley.com]
Sent: Thursday, June 16, 2016 2:22 PM
To: David Loewenstein
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; MMoran@foley.com; Milo Eadan
Subject: RE: Request for extension of due dates

David:

Attached is a draft stipulation modifying the scheduling order as proposed. M2M agrees to produce its expert for deposition before September 9th in New York or Boston.

Let me know whether we have your consent to file.

Thanks.

-Jeff

Jeffrey N. Costakos

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From: David Loewenstein [<mailto:DLoewenstein@PearlCohen.com>]
Sent: Monday, June 13, 2016 3:15 PM
To: Costakos, Jeffrey N.
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; Moran, Michelle A.; Milo Eadan
Subject: RE: Request for extension of due dates

Jeff,

I am responding to your email and voicemail seeking to modify dates in the IPR.

Telit agrees to M2M's request to reset Due Date 1 from July 6th to July 27th, and Due Date 2 from September 19th to October 10th. However, this agreement is contingent on M2M agreeing to produce its expert for a deposition before September 9th, in New York or Boston.

I have not been able to confirm dates with Mr. Savolainen, but I am going to shoot for July 7th or 8th in New York. I hope to have an answer for you tomorrow.

If this is agreeable, please send us a draft motion to modify the due dates.

Thanks,
David

From: JCostakos@foley.com [<mailto:JCostakos@foley.com>]
Sent: Friday, June 10, 2016 2:35 PM
To: David Loewenstein
Cc: Caleb Pollack; Guy Yonay; Kyle Auteri; MMoran@foley.com; Milo Eadan
Subject: Request for extension of due dates

David:

Following up my voicemail, M2M would like an extension for due date 1, which a corresponding extension for your due date 2. Specifically, we would like to extend due date 1 (the patent owner response) by three weeks from July 6 to July 27, and due date 2 (the petitioner's reply) by three weeks from September 19 to October 10. Due date 3 is the

patent owner's reply in support of any motion to amend, and we would keep that due date at October 19. Let me know if those dates are acceptable and whether you would consent to a motion to amend the schedule accordingly.

Also, we would like you to provide some dates for the deposition of Mr. Savolainen.

Let me know if you have any questions.

Thanks.

-Jeff

Jeffrey N. Costakos

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Milwaukee, WI 53202-5306
P 414.297.5782

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