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Sent: Friday, December 1, 2017 2:22 PM

To: 'Trials' <Trials@USPTO.GOV>

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Subject: IPR2016-01656 and -01658 | Request for Conference Cal

To the Honorable Board,

Patent Owner respectfully requests a conference call at the Board's earliest convenience to seek leave for the following:

1. To file a written opposition to Petitioner's request made on November 29, 2017 for leave to move to withdraw the Petitions.
2. To move to require Petitioner to respond to discovery with respect to the items that the Board identified at page 7 of the transcript of the conference call held on November 3, 2017, including "who has been directing the proceedings, who participated in preparing the petition, who has been funding it, how it has been funded, are the same lawyers involved, who the Petitioner's counsel is in this case taking direction from."
3. To renew its request (initially made May 10, 2017) for leave to file a motion to terminate the above-referenced proceedings in both IPR2016-01656 and -01658 as time-barred under 35 U.S.C. Sec. 315(b), which termination would be operative with respect to all petitioners (including both the original petitioner and the petitioners that subsequently joined in the IPR2016-01658 proceeding via joinder).

Respectfully submitted,

Ronald Abramson
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EXHIBIT 2021-1

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