

From: Leary, Matthew <Matthew.Leary@wilmerhale.com>

Sent: Thursday, May 24, 2018 12:33 PM

To: Trials <Trials@USPTO.GOV>

Cc: Zac <zac@ahtlawfirm.com>; Matt Antonelli <matt@ahtlawfirm.com>; larrythompson <larry@ahtlawfirm.com>; jonathan@unifiedpatents.com; Roshan Mansinghani <roshan@unifiedpatents.com>; Cavanaugh, David <David.Cavanaugh@wilmerhale.com>; Williams, Daniel V. <Daniel.Williams@wilmerhale.com>; Ryan Pinckney <ryan@ahtlawfirm.com>

Subject: IPR2017-01430

Dear Honorable Board,

I write on behalf of petitioner in regard to IPR2017-01430. In its order on supplemental briefing (Paper 16), the Board said that Petitioner's supplemental reply "may not raise new arguments or submit new evidence." Petitioner wishes to clarify that it may present a supplemental expert declaration in support of its supplemental reply, along with corroborating evidence for that declaration. Petitioner also asks that it be allowed to submit new evidence to the same extent such evidence would have been allowed had all the claims been instituted originally (as the SAS ruling said they should have been).

Petitioner requests a teleconference with the Board and Patent Owner for the purpose of discussing Petitioner's requests. Petitioner will supply a court reporter for this conference. Petitioner has conferred with Patent Owner, and understands that Patent Owner opposes these requests.

Petitioner proposes a call on Friday the 25th before 12:30ET if that works for the Board. Patent Owner represented that due to travel, its lead counsel would not be available until June 2, and that he didn't think that "back-up counsel is necessary to address Unified's request." The patent owner has not indicated whether backup counsel is available at the day and time proposed above.

Respectfully,

Matthew J. Leary | WilmerHale

1225 Seventeenth St.

Suite 2600

Denver, CO 80202 USA

+1 720 274 3153 (t)

+1 720 274 3133 (f)

+1 857 498 1055 (c)

matthew.leary@wilmerhale.com