

Cherry, Chris M

From: Cherry, Chris M
Sent: Tuesday, September 25, 2018 1:44 PM
To: Brett Mangrum
Cc: Cavanaugh, David; jonathan@unifiedpatents.com; Barazesh, Ellyar; Jim Etheridge; Ryan Loveless; Jeff Huang; sean.burdick@unilocusa.com; Williams, Daniel V.; Roshan Mansinghani; Jonathan Bowser; Travis Richins
Subject: RE: IPR2018-00199 - Additional Discovery

Counsel,

This email is in response to Patent Owner's assertion in the Patent Owner Response to Petition that Petitioner voluntarily waived confidentiality of all Petitioner's produced documents. Please be advised that Petitioner's counsel inadvertently included recipients who have not signed an Acknowledgement of the default Protective Order when providing produced documents with confidential information subject to the Protective Order. Petitioner's counsel was made aware of this inadvertent disclosure on September 25, 2018. Please note that after being made aware, we immediately recalled the email dated September 11, 2018, forwarding the produced documents and also immediately withdrew access to the share site containing the documents.

We ask that you take appropriate action to ensure that any material inadvertently disclosed to any unauthorized person is properly disposed of. Accordingly, the email we sent, dated September 11, 2018, access to the share site provided on September 11, 2018, and our subsequent remedial actions, do not constitute a waiver of confidentiality by Unified.

Best regards,
Chris

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From: Cherry, Chris M
Sent: Tuesday, September 11, 2018 6:07 PM
To: Brett Mangrum <brett@etheridgelaw.com>
Cc: Cavanaugh, David <David.Cavanaugh@wilmerhale.com>; jonathan@unifiedpatents.com; Barazesh, Ellyar <Ellyar.Barazesh@wilmerhale.com>; Jim Etheridge <jim@etheridgelaw.com>; Ryan Loveless <ryan@etheridgelaw.com>; Jeff Huang <jeff@etheridgelaw.com>; sean.burdick@unilocusa.com <'sean.burdick@unilocusa.com'>; Williams, Daniel V. <Daniel.Williams@wilmerhale.com>; Roshan Mansinghani <roshan@unifiedpatents.com>; Jonathan Bowser