

Cherry, Chris M

From: Brett Mangrum <brett@etheridgelaw.com>
Sent: Wednesday, October 31, 2018 1:50 PM
To: Cherry, Chris M
Cc: Cavanaugh, David; jonathan@unifiedpatents.com; Barazesh, Ellyar; Williams, Daniel V.; Roshan Mansinghani; Jonathan Bowser; Ryan Loveless; Jim Etheridge; sean.burdick@unilocusa.com; Travis Richins; Jeff Huang
Subject: RE: IPR2018-00199 - Additional Discovery

Chris:

We have proposed some changes to your email below to remove argumentative statements and to provide a more fulsome factual summary. Given that you provided no explanation for why you chose to remove counsel from this discussion, I have re-copied those individuals in this response. We agree a conference call with the Board is not necessary. However, counsel can offer 9am-noon (CST) Tuesday and Wednesday of next week as available times to meet with the Board.

Dear Honorable Board,

In IPR2018-00199, Patent Owner filed a Patent Owner Response under seal on September 21, 2018, that contains what Petitioner contends is its confidential information. Patent Owner did not include a Motion to Seal with its Response. The parties conferred in a good faith effort and a dispute remains as to the need for, and content of, a Motion to Seal and as to whether waiver has occurred.

Petitioner seeks authorization to file an Opposed Motion to Seal in this proceeding relating to the inclusion of what Petitioner contends is its confidential information included in Patent Owner's Response.

The parties do not feel a teleconference with the Board is necessary. If the Board requires a teleconference, however, counsel for Patent Owner and Petitioner are available XX-XX from XX-XX Eastern. Counsel can provide additional dates and times for the Board, if needed.

Best regards,

Regards,
Brett

From: Cherry, Chris M <Chris.Cherry@wilmerhale.com>
Sent: Wednesday, October 31, 2018 12:12 PM
To: Brett Mangrum <brett@etheridgelaw.com>
Cc: Cavanaugh, David <David.Cavanaugh@wilmerhale.com>; jonathan@unifiedpatents.com; Barazesh, Ellyar <Ellyar.Barazesh@wilmerhale.com>; Williams, Daniel V. <Daniel.Williams@wilmerhale.com>; Roshan Mansinghani <roshan@unifiedpatents.com>; Jonathan Bowser <jbowser@unifiedpatents.com>
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Brett,

Unified v. Uniloc