

Sean Li

From: Sean Li
Sent: Tuesday, September 18, 2018 10:01 AM
To: 'Hotze, Melissa'; 'intel.alacritech.ipr'; 'Constant, Justin'; 'McPherson, Patrick D.'; 'Xue, David T.'; 'Khachatourian, Karineh'; 'christopher.douglas@alston.com'; 'kirk.bradley@alston.com'; 'benjamin.weed.PTAB@klgates.com'; 'erik.halverson@klgates.com'
Cc: Alacritech-IPR-Team
Subject: Alacritech m/c regarding motion for additional discovery

Counsel,

During the hearing, Intel on behalf of petitioners asserted, contrary to prior statements and the Board's order, that Dell (and others) is not a real party in interest in Intel's and Cavium's IPR petitions vis-à-vis the "readily acknowledged" and "of record" indemnification relationship that existed at the time of filing the May 9 – July 3, 2018 IPR petitions. See August 23, 2018 Order. As this information is relevant to the subsequently filed IPR2018-00226, -00234, and -00401, Alacritech intends to seek leave from the Board to file a motion for additional discovery requesting production of documents and information concerning Intel's and Cavium's indemnity relationships with Dell, Wistron and CenturyLink.

We write to ask Intel's, Cavium's, Dell's and Wistron's availability for a conference call with the Board to discuss Alacritech's requested motion for additional discovery in IPR2018-00226, -00234, and -00401.

Please let us know what times you are available this week for a call with the Board.

Regards,
Ziyong (Sean) Li
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