

From: [Redjaian, Babak](#)
To: ["trials@uspto.gov"](mailto:trials@uspto.gov)
Cc: [McPhe, David](#); [Yorks, Ben](#); [#FraunhoferIPRs \[Int\]](#); [Caplan, Jonathan S.](#); [Baghdassarian, Mark](#); [Price, Jeffrey H.](#); [Hedvat, Shannon H.](#); [Redjaian, Babak](#)
Subject: [EXTERNAL] RE: IPR Nos. 2018-00681, 2018-00682, 2018-00689, 2018-00690
Date: Tuesday, January 15, 2019 5:41:56 PM

Your Honors,

Patent Owner Fraunhofer opposes Petitioner's request for yet additional briefing on the RPI issue. Each party has now had three opportunities to file written submissions regarding the RPI disclosure requirement, and there is no reason at this point for a fourth round. Petitioner's email merely cites a recent non-precedential panel decision (*Google*), which does not set forth any new principle of law that did not already exist at the time of the parties' earlier submissions. Moreover, the Precedential Opinion Panel has already denied Petitioner's request for further review of the RPI issue. Accordingly, Petitioner's request for a fourth round of briefing on the RPI issue should be denied.

Respectfully submitted,
Babak Redjaian
Counsel for Patent Owner

From: Hedvat, Shannon H. <SHedvat@KRAMERLEVIN.com>
Sent: Tuesday, January 15, 2019 2:02 PM
To: 'trials@uspto.gov' <trials@uspto.gov>
Cc: Redjaian, Babak <BRedjaian@irell.com>; MCPhe, David <DMcPhe@irell.com>; Yorks, Ben <BYorks@irell.com>; #FraunhoferIPRs [Int] <FraunhoferIPRs@irell.com>; Caplan, Jonathan S. <JCaplan@KRAMERLEVIN.com>; Baghdassarian, Mark <MBaghdassarian@KRAMERLEVIN.com>; Price, Jeffrey H. <JPrice@KRAMERLEVIN.com>
Subject: IPR Nos. 2018-00681, 2018-00682, 2018-00689, 2018-00690

Your Honors,

Petitioner Sirius XM Radio Inc. ("SXM") respectfully requests an opportunity to reply to Patent Owner's Response to SXM's Requests for Rehearing in each of the above-referenced actions. SXM previously submitted a request, on December 7, 2018, seeking authorization to submit a Notice of Supplemental Authority and argument regarding the Institution Decision in *Google LLC v. Seven Networks, LLC*, Case No. IPR2018-01117, Paper No. 20 (November 19, 2018) (publicly available on November 27, 2018). However, the Board did not address SXM's request to be heard on this issue when inviting Fraunhofer to provide responses to SXM's Requests for Rehearing in its Order dated December 21, 2018. In light of Patent Owner's recently filed Responses addressing the *Google* Decision, SXM respectfully requests the opportunity to respond with its position regarding *Google*'s relevance to its pending Requests for Rehearing.

Based on correspondence with Patent Owner, Patent Owner has indicated that it opposes SXM's request and has informed SXM that it "should be given an opportunity to file a response to any further written submission by Petitioner."

Respectfully submitted,
Shannon Hedvat
Counsel for Petitioner

Shannon H. Hedvat
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