

**From:** Brett Mangrum brett@etheridgelaw.com  
**Subject:** RE: IPR2018-00884: Dr. Easttom Deposition

**Date:** February 7, 2019 at 2:07 PM

**To:** Paul Hart paul.hart@eriseip.com, Danny Butts danny@etheridgelaw.com, Ryan Loveless ryan@etheridgelaw.com, Jeff Huang jeff@etheridgelaw.com, Jim Etheridge jim@etheridgelaw.com

**Cc:** Adam Seitz adam.seitz@eriseip.com



Counsel,

Uniloc cites to Dr. Easttom's declaration solely for the proposition that "a POSITA would understand that the entity intercepting a message would not be one of the intended recipients of that message. EX2001 ¶¶ 8-9. In other words, a POSITA would understand that the device that is intercepting a message would be a third party to the intended recipients of that message."

Under these circumstances, Uniloc believes a cross examination of Dr. Easttom is a waste of the parties' time and resources. If you still disagree, Uniloc would not oppose a motion to strike Dr. Easttom's declaration.

Regards,  
Brett

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**From:** Paul Hart <paul.hart@eriseip.com>

**Sent:** Tuesday, February 5, 2019 3:07 PM

**To:** Danny Butts <danny@etheridgelaw.com>; Ryan Loveless <ryan@etheridgelaw.com>; Brett Mangrum <brett@etheridgelaw.com>; Jeff Huang <jeff@etheridgelaw.com>; Jim Etheridge <jim@etheridgelaw.com>

**Cc:** Adam Seitz <adam.seitz@eriseip.com>

**Subject:** IPR2018-00884: Dr. Easttom Deposition

Counsel,

We would like to schedule Dr. Easttom's deposition in IPR2018-00884. The week of March 18 works well on our end. Please let us know if Dr. Easttom is available any day that week.

Thanks very much.

Best,  
Paul

Paul Hart | Shareholder  
Erise IP, P.A.

5600 Greenwood Plaza Blvd.

Suite 200

Greenwood Village, CO 80111

(main) 913-777-5600

(direct) 720-689-5441

(fax) 913-777-5601

[paul.hart@eriseip.com](mailto:paul.hart@eriseip.com)

[www.eriseip.com](http://www.eriseip.com)

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