

From: Dokhanchy, Reza <reza.dokhanchy@kirkland.com>

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To: Trials <Trials@USPTO.GOV>

Cc: Calvaruso, Joseph <jcalvaruso@orrick.com>; JVCPTABDocket <JVCPTABDocket@orrick.com>; Zhu, Guang-Yu <Guang-Yu.Zhu@finnegan.com>; Gramenopoulos, C. Gregory <c.gregory.gramenopoulos@finnegan.com>; Martinelli, Richard F. <rmartinelli@orrick.com>; Horn, Kelly <Kelly.Horn@finnegan.com>; Santos, Victor H. <vsantos@orrick.com>; Goryunov, Eugene <egoryunov@kirkland.com>; Deoras, Akshay S. <adeoras@kirkland.com>; Alper, Adam R. <aalper@kirkland.com>; De Vries, Mike W. <michael.devries@kirkland.com>; #Avigilon_Axis <Avigilon_Axis@kirkland.com>

Subject: IPR2019-00235 - Request for Conference Call

Dear Board:

Patent Owner Avigilon Fortress Corporation (“Avigilon”) respectfully requests a conference call to seek permission to submit a reply to Petitioners’ request for rehearing to address Petitioners’ newly-raised arguments, including that the issues in IPR2019-00235 are akin to those at issue in Hulu, LLC v. Sound View Innovations, LLC (IPR2018-01039). Avigilon seeks to correct several inaccuracies in Petitioners’ request for rehearing. Avigilon believes that the points it seeks to raise in its requested reply could also explain why Precedential Opinion Panel review, which Petitioners have also requested, is not necessary. The parties have conferred and Petitioners oppose this request.

Sincerely,
Reza Dokhanchy

Reza Dokhanchy

KIRKLAND & ELLIS LLP
555 California Street, San Francisco, CA 94104
T +1 415 439 1469 F +1 415 439 1500

reza.dokhanchy@kirkland.com

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