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**From:** Hannah Santasawatkul <Hannah\_Santasawatkul@txwd.uscourts.gov>  
**Sent:** Tuesday, October 13, 2020 3:21 PM  
**To:** McNamara, Michael; Lee, Rose S.; Trac, Bill; McGrath, Todd; brahebi\_mofo.com; Gallegos, Hector G.; steve.ravel@khh.com; #Google-Parus; Silverman, Daniel; Snyder, Darin; Almeling, David; Simmons, Luann L.; Liang, Mark; pamstutz@scottdoug.com; smconnico@scottdoug.com; kevinjohnson@quinnemanuel.com; mikejones@potterminton.com; calebbraley@quinnemanuel.com; marissaducca@quinnemanuel.com; toddbriggs@quinnemanuel.com; victoriamaroulis@quinnemanuel.com; joshuascheufler@quinnemanuel.com; bshelton@sheltoncoburn.com; dhadden@fenwick.com; rranganath@fenwick.com; sshamilov@fenwick.com; min.wu@fenwick.com; Amazon-Parus@fenwick.com; qe-parus-samsung@quinnemanuel.com; Patel, Fahd H.; Han, Chris  
**Cc:** Parus Holdings  
**Subject:** RE: Parus - Scheduling Trials

Good afternoon Counsel,

I completely understand. You may use 7/12/2021 as the scheduled trial date.

Best,  
Hannah

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**From:** McNamara, Michael <MMcNamara@mintz.com>  
**Sent:** Tuesday, October 13, 2020 12:44 PM  
**To:** Hannah Santasawatkul <Hannah\_Santasawatkul@txwd.uscourts.gov>; Lee, Rose S. <RoseLee@mofo.com>; Trac, Bill <btrac@omm.com>; McGrath, Todd <TMMcGrath@mintz.com>; brahebi\_mofo.com <BRahebi@mofo.com>; Gallegos, Hector G. <HGallegos@mofo.com>; steve.ravel@khh.com; #Google-Parus <GoogleParus@omm.com>; Silverman, Daniel <dsilverman@omm.com>; Snyder, Darin <dsnyder@omm.com>; Almeling, David <dalmeling@omm.com>; Simmons, Luann L. <lsimmons@omm.com>; Liang, Mark <mliang@omm.com>; pamstutz@scottdoug.com; smconnico@scottdoug.com; kevinjohnson@quinnemanuel.com; mikejones@potterminton.com; calebbraley@quinnemanuel.com; marissaducca@quinnemanuel.com; toddbriggs@quinnemanuel.com; victoriamaroulis@quinnemanuel.com; joshuascheufler@quinnemanuel.com; bshelton@sheltoncoburn.com; dhadden@fenwick.com; rranganath@fenwick.com; sshamilov@fenwick.com; min.wu@fenwick.com; Amazon-Parus@fenwick.com; qe-parus-samsung@quinnemanuel.com; Patel, Fahd H. <FPatel@mofo.com>; Han, Chris <CHan@mofo.com>  
**Cc:** Parus Holdings <ParusHoldings@mintz.com>  
**Subject:** RE: Parus - Scheduling Trials

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Ms. Santasawatkul:

Thank you again to Judge Albright and you for making time for our scheduling issues last week, especially in the middle of a trial. The trial schedule is important not only for our planning in this case, but also because the issue of the trial date and Apple's pending motion to stay have come up in the IPR proceedings, and we want to make sure we provide timely and accurate information to the PTAB about those issues.

**Parus Exhibit 2018**

We are available to answer any questions the Court may have related to these matters.

Best regards,

Mike

**Michael McNamara**

*Member*

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**From:** Hannah Santasawatkul <[Hannah\\_Santasawatkul@txwd.uscourts.gov](mailto:Hannah_Santasawatkul@txwd.uscourts.gov)>

**Sent:** Thursday, October 8, 2020 12:35 PM

**To:** Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; McNamara, Michael <[MMcNamara@mintz.com](mailto:MMcNamara@mintz.com)>; Trac, Bill <[btrac@omm.com](mailto:btrac@omm.com)>; McGrath, Todd <[TMMcGrath@mintz.com](mailto:TMMcGrath@mintz.com)>; brahebi\_mofo.com <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Gallegos, Hector G. <[HGallegos@mofo.com](mailto:HGallegos@mofo.com)>; [steve.ravel@khh.com](mailto:steve.ravel@khh.com); #Google-Parus <[GoogleParus@omm.com](mailto:GoogleParus@omm.com)>; Silverman, Daniel <[dsilverman@omm.com](mailto:dsilverman@omm.com)>; Snyder, Darin <[dsnyder@omm.com](mailto:dsnyder@omm.com)>; Almeling, David <[dalmeling@omm.com](mailto:dalmeling@omm.com)>; Simmons, Luann L. <[lsimmons@omm.com](mailto:lsimmons@omm.com)>; Liang, Mark <[mliang@omm.com](mailto:mliang@omm.com)>; [pamstutz@scottdoug.com](mailto:pamstutz@scottdoug.com); [smconnico@scottdoug.com](mailto:smconnico@scottdoug.com); [kevinjohnson@quinnemanuel.com](mailto:kevinjohnson@quinnemanuel.com); [mikejones@potterminton.com](mailto:mikejones@potterminton.com); [calebbraley@quinnemanuel.com](mailto:calebbraley@quinnemanuel.com); [marissaducca@quinnemanuel.com](mailto:marissaducca@quinnemanuel.com); [toddbriggs@quinnemanuel.com](mailto:toddbriggs@quinnemanuel.com); [victoriamaroulis@quinnemanuel.com](mailto:victoriamaroulis@quinnemanuel.com); [joshuascheufler@quinnemanuel.com](mailto:joshuascheufler@quinnemanuel.com); [bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com); [dhadden@fenwick.com](mailto:dhadden@fenwick.com); [rranganath@fenwick.com](mailto:rranganath@fenwick.com); [sshamilov@fenwick.com](mailto:sshamilov@fenwick.com); [min.wu@fenwick.com](mailto:min.wu@fenwick.com); [Amazon-Parus@fenwick.com](mailto:Amazon-Parus@fenwick.com); [qe-parus-samsung@quinnemanuel.com](mailto:qe-parus-samsung@quinnemanuel.com); Patel, Fahd H. <[FPatel@mofo.com](mailto:FPatel@mofo.com)>; Han, Chris <[CHan@mofo.com](mailto:CHan@mofo.com)>

**Cc:** Parus Holdings <[ParusHoldings@mintz.com](mailto:ParusHoldings@mintz.com)>

**Subject:** RE: Parus - Scheduling Trials

Good morning Counsel,

I apologize for my delayed response, the Court is in trial all week.

As we are still a ways out from trial, the Court is going to schedule all four of the trials for 7/12/2021. The first trial will go 7/12 but as we get closer to trial and details solidify we will determine the actual order. Depending on what the Court decides, Samsung will likely be the last to be tried with a trial date sometime in August.

I apologize that I cannot be more specific with the dates but I'm sure you all know that as soon as we set definite dates something will inevitably come up and ruin our plans. We hope that this strategy to scheduling will help us to be more flexible as issues arise.

Best,  
Hannah

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**From:** Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>  
**Sent:** Friday, October 2, 2020 7:09 PM  
**To:** McNamara, Michael <[MMcNamara@mintz.com](mailto:MMcNamara@mintz.com)>; Hannah Santasawatkul <[Hannah\\_Santasawatkul@txwd.uscourts.gov](mailto:Hannah_Santasawatkul@txwd.uscourts.gov)>; Trac, Bill <[btrac@omm.com](mailto:btrac@omm.com)>; McGrath, Todd <[TMMcGrath@mintz.com](mailto:TMMcGrath@mintz.com)>; brahebi\_mofo.com <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Gallegos, Hector G. <[HGallegos@mofo.com](mailto:HGallegos@mofo.com)>; [steve.ravel@khh.com](mailto:steve.ravel@khh.com); #Google-Parus <[GoogleParus@omm.com](mailto:GoogleParus@omm.com)>; Silverman, Daniel <[dsilverman@omm.com](mailto:dsilverman@omm.com)>; Snyder, Darin <[dsnyder@omm.com](mailto:dsnyder@omm.com)>; Almeling, David <[dalmeling@omm.com](mailto:dalmeling@omm.com)>; Simmons, Luann L. <[lsimmons@omm.com](mailto:lsimmons@omm.com)>; Liang, Mark <[mliang@omm.com](mailto:mliang@omm.com)>; [pamstutz@scottdoug.com](mailto:pamstutz@scottdoug.com); [smconnico@scottdoug.com](mailto:smconnico@scottdoug.com); [kevinjohnson@quinnemanuel.com](mailto:kevinjohnson@quinnemanuel.com); [mikejones@potterminton.com](mailto:mikejones@potterminton.com); [calebbraleley@quinnemanuel.com](mailto:calebbraleley@quinnemanuel.com); [marissaducca@quinnemanuel.com](mailto:marissaducca@quinnemanuel.com); [toddbriggs@quinnemanuel.com](mailto:toddbriggs@quinnemanuel.com); [victoriamaroulis@quinnemanuel.com](mailto:victoriamaroulis@quinnemanuel.com); [joshuascheufler@quinnemanuel.com](mailto:joshuascheufler@quinnemanuel.com); [bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com); [dhadden@fenwick.com](mailto:dhadden@fenwick.com); [rranganath@fenwick.com](mailto:rranganath@fenwick.com); [sshamilov@fenwick.com](mailto:sshamilov@fenwick.com); [min.wu@fenwick.com](mailto:min.wu@fenwick.com); [Amazon-Parus@fenwick.com](mailto:Amazon-Parus@fenwick.com); [ge-parus-samsung@quinnemanuel.com](mailto:ge-parus-samsung@quinnemanuel.com); Patel, Fahd H. <[FPatel@mofo.com](mailto:FPatel@mofo.com)>; Han, Chris <[CHan@mofo.com](mailto:CHan@mofo.com)>  
**Cc:** Parus Holdings <[ParusHoldings@mintz.com](mailto:ParusHoldings@mintz.com)>  
**Subject:** Parus - Scheduling Trials

Ms. Santasawatkul:

I write on behalf of Defendants because plaintiff's email was sent without allowing Defendants to offer their positions and does not correctly reflect Defendants' positions.

Like Plaintiff, Defendants jointly request that separate trials be set for each Defendant. But because of the multiple parties and schedules involved, Defendants respectfully request a telephonic hearing to discuss trial scheduling and ordering. Moreover, to the extent Parus's email suggests that a finding of liability as to one defendant should somehow bind any other defendant regarding similar products, services, or "implementations," Defendants disagree and do not believe that complex legal issue is appropriately addressed at this time.

Further, Apple states that it is also looking into August dates in addition to being available 7/12 – 7/23.

Best regards,  
Rose

## ROSE S. LEE

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**Sent:** Friday, October 2, 2020 12:56 PM  
**To:** Hannah Santasawatkul <[Hannah\\_Santasawatkul@txwd.uscourts.gov](mailto:Hannah_Santasawatkul@txwd.uscourts.gov)>; Trac, Bill <[btrac@omm.com](mailto:btrac@omm.com)>; McGrath, Todd <[TMMcGrath@mintz.com](mailto:TMMcGrath@mintz.com)>; Rahebi, Bitu <[BRahebi@mofo.com](mailto:BRahebi@mofo.com)>; Gallegos, Hector G. <[HGallegos@mofo.com](mailto:HGallegos@mofo.com)>; [steve.ravel@khh.com](mailto:steve.ravel@khh.com); Callahan, Matt C. <[MCallahan@mofo.com](mailto:MCallahan@mofo.com)>; Lee, Rose S. <[RoseLee@mofo.com](mailto:RoseLee@mofo.com)>; #Google-Parus <[GoogleParus@omm.com](mailto:GoogleParus@omm.com)>; Silverman, Daniel <[dsilverman@omm.com](mailto:dsilverman@omm.com)>; Snyder, Darin <[dsnyder@omm.com](mailto:dsnyder@omm.com)>; Almeling, David <[dalmeling@omm.com](mailto:dalmeling@omm.com)>; Simmons, Luann L. <[lsimmons@omm.com](mailto:lsimmons@omm.com)>; Liang, Mark <[mliang@omm.com](mailto:mliang@omm.com)>; [pamstutz@scottdoug.com](mailto:pamstutz@scottdoug.com); [smconnico@scottdoug.com](mailto:smconnico@scottdoug.com); [kevinjohnson@quinnemanuel.com](mailto:kevinjohnson@quinnemanuel.com); [mikejones@potterminton.com](mailto:mikejones@potterminton.com); [calebbraleley@quinnemanuel.com](mailto:calebbraleley@quinnemanuel.com); [marissaducca@quinnemanuel.com](mailto:marissaducca@quinnemanuel.com); [toddbriggs@quinnemanuel.com](mailto:toddbriggs@quinnemanuel.com); [victoriamaroulis@quinnemanuel.com](mailto:victoriamaroulis@quinnemanuel.com); [joshuascheufler@quinnemanuel.com](mailto:joshuascheufler@quinnemanuel.com); [bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com); [dhadden@fenwick.com](mailto:dhadden@fenwick.com); [rranganath@fenwick.com](mailto:rranganath@fenwick.com); [sshamilov@fenwick.com](mailto:sshamilov@fenwick.com); [min.wu@fenwick.com](mailto:min.wu@fenwick.com); [Amazon-Parus@fenwick.com](mailto:Amazon-Parus@fenwick.com); [ge-parus-samsung@quinnemanuel.com](mailto:ge-parus-samsung@quinnemanuel.com)

Cc: Parus Holdings <[ParusHoldings@mintz.com](mailto:ParusHoldings@mintz.com)>

Subject: RE: Parus - Draft Protective Order

**External Email**

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Ms. Santasawatkul:

During the claim construction hearing, Judge Albright asked the parties to meet and confer and come up with available time in the second half of July that they were available for trial. The following is the availability of the parties:

- Parus: 7/12 – 7/31, Parus can also be available in August
- Apple: 7/12 – 7/23
- Google: 7/12 – 7/31
- Amazon: 7/12 – 7/31
- Samsung: unavailable until 8/9

Parus believes there should be four separate trials. The Apple, Amazon, Google, and Samsung trials should determine liability for the Siri, Alexa, Google Assistant and Bixby implementations, respectively. The separate trials should also resolve any liability for additional services uncovered during discovery.

Let us know if you require anything further.

Regards,

Mike.

**Michael McNamara**

*Member*

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