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Subject: IPR2020-01065, -01125, and -01177 - Request for Reply Briefing
Date: Friday, October 30, 2020 7:12:12 PM

Dear Members of the Board,

Petitioner Illumina requests authorization from the Board to file a Reply brief in each of IPR2020-01065, -01125, and -01177 (Illumina v. Columbia). Petitioner requests a 5-page Reply on the same topics for which the Board authorized Reply briefing in the closely related matter of IPR2020-00988. Those topics concern discretionary denial under 314(a) and 325(d), as well as claim construction of the term "chemical linker." Also, Illumina requests authorization to submit non-testimonial exhibits in the same manner that the Board authorized in IPR2020-00988.

Good cause exists for Petitioner to address Patent Owner's arguments concerning 314(a) and the state of the parallel district court litigation, as well as Patent Owner's theories under 325(d) and its characterizations of Sanger sequencing and Hiatt. Good cause also exists for Petitioner to address the statements raised in Patent Owner's Preliminary Responses concerning whether the term "chemical linker" requires construction in view of the District Court's Markman Order.

The parties have conferred. Patent Owner opposes Petitioner's request.

Counsel for Patent Owner is included on this email. The parties are available for a teleconference with the Board, if necessary, on:

- Tuesday 11/3 from 10:00 AM-1:00 PM and 2:00-6:00 PM Eastern Time;
- Wednesday 11/4 from 10:00 AM-12:00 PM and 3:00-6:00 PM Eastern Time;
- Thursday 11/5 from 10:00-11:00 AM and 2:30-6:00 PM Eastern Time; and
- Friday 11/6 from 10:00 AM-6:00 PM Eastern Time.

Regards,

Kerry Taylor

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