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Subject: BMW v. Paice, IPR2020-00994, -01299, -01386

Dear Board

Patent Owners in IPR2020-00994, -01299, and -01386 request a teleconference with the Board to discuss modifying the schedules in the aforementioned proceedings to align common deadlines across all three proceedings. Patent Owners provide a proposed modified schedule below and welcome the Board's input in adjusting the schedules to conserve party and Board resources. Patent Owners have contacted Petitioners concerning the proposed adjustment and understand that Petitioners oppose such a modification.

Counsel for Patent Owners and Petitioners can be available for a phone call on Thursday March 4th after 2:30PM EST and Friday March 5th before 3PM EST.

Best Regards,
 Brian Livedalen
 Counsel for Patent Owners

Deadline	IPR2020-00994 Current Deadline	IPR2020-01299 Current Deadline	IPR2020-01386 Current Deadline	New Proposed Date for all three proceedings
D/L for Patent Owner's response to petition	2/11/2021	04/13/2021	5/3/2021	4/27/2021 (for -01299 and -01386 proceedings only; Patent Owners already submitted the POR in -00994)
D/L for Petitioner's reply to patent owner response	5/6/2021	07/06/2021	7/26/2021	6/23/2021
D/L for Patent owner's sur-reply to petitioner's response to petition	6/17/2021	08/17/2021	9/7/2021	7/23/2021

D/L for Request for Oral Argument	7/8/2021	09/07/2021	9/28/2021	7/29/2021
D/L for Motion to exclude evidence	7/29/2021	09/28/2021	10/19/2021	8/11/2021
D/L for Opposition to motion to exclude	8/5/2021	10/05/2021	10/26/2021	8/18/2021
D/L for Request for prehearing conference	8/5/2021	10/05/2021	10/26/2021	8/18/2021
D/L for Reply to opposition to motion to exclude	8/12/2021	10/12/2021	11/2/2021	8/25/2021
D/L for Oral argument (if requested)	8/19/2021	10/19/2021	11/9/2021	9/1/2021

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