

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**BAYERISCHE MOTOREN WERKE AKTIENGESELLSCHAFT & BMW
OF NORTH AMERICA, LLC,**
Petitioners

v.

PAICE LLC & THE ABELL FOUNDATION, INC.
Patent Owners

Case IPR2020-01299
Patent 8,630,761

**PETITIONERS' NOTICE OF DEPOSITION OF
MAHDI SHAHBAKHTI PH.D. UNDER 37 C.F.R. §42.53**

Petitioners' Notice of Deposition of Mahdi Shahbakhti Ph.D.
Case IPR2020-01299
U.S. Patent No. 8,630,761

Pursuant to 37 C.F.R. § 42.53, Petitioners' Bayerische Motoren Werke Aktiengesellschaft & BMW of North America, LLC ("BMW") notices the deposition of Mahdi Shahbakhti Ph.D. in connection with IPR2020-01299. In accordance with 37 C.F.R. § 42.53, the parties have agreed upon a date and time for the deposition, which will take place virtually starting at 9:00 a.m. MT on June 17, 2021.

The deposition will be recorded by stenographic as well as sound-and-visual means. The arrangements for the reporter and videographer will be made by counsel for BMW. A link will also be provided prior to the deposition.

Dated: May 28, 2021

Respectfully submitted,

/Vincent J. Galluzzo/
Jeffrey D. Sanok (Reg. No. 32,169)
Vincent J. Galluzzo (Reg. No. 67,830)
Crowell & Moring LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004-2595
Tel.: (202) 624-2500
Fax.: (202) 628-8844
jsanok@crowell.com
vgalluzzo@crowell.com

Scott L. Bittman (Reg. No. 55,007)
Jacob Z. Zambrzycki (*pro hac vice*)
Crowell & Moring LLP
590 Madison Avenue, 20th Floor

Petitioners' Notice of Deposition of Mahdi Shahbakhti Ph.D.

Case IPR2020-01299

U.S. Patent No. 8,630,761

New York, NY 10022-2544

Telephone No.: (212) 223-4000

Facsimile No.: (212) 223-4134

sbittman@crowell.com

jzambrzycki@crowell.com

Counsel for Petitioners

Bayerische Motoren Werke Aktiengesellschaft

and BMW of North America, LLC

Certificate of Service

Pursuant to 37 C.F.R. § 42.6(e)(4), I certify that the foregoing **PETITIONERS' NOTICE OF DEPOSITION OF MAHDI SHAHBAKHTI PH.D. UNDER 37 C.F.R. §42.53**, was served electronically by filing this document through the PTAB E2E system, as well as by e-mailing copies to the following address for counsel of record for Patent Owners:

Ruffin B. Cordell
Indranil Mukerji
Brian J. Livedalen
Timothy W. Riffe
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
IPR36351-0004IP1@fr.com
PTABInbound@fr.com

Respectfully submitted,

Dated: May 28, 2021

/Vincent J. Galluzzo/
Vincent J. Galluzzo