

From: [Cecil Key](#)
To: [Nash, Brian C.](#); [Jay Kesan](#); [Trials](#)
Cc: [Finkel, Evan](#); [Hindman, Matthew W.](#); [Gartman, Cody A.](#); [Intel-SRC](#); [Ari Rafilson \(arafilson@shorechan.com\)](#); [Henning Schmidt](#)
Subject: RE: Intel v. FG SRC, IPR2020-01449: Patent Owner's Request to Schedule a Conference Call
Date: Thursday, May 20, 2021 3:40:17 PM

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Your Honors:

Patent Owner objects to the argumentative nature of Petitioner's email in response to a simple request for guidance on the current procedures. Patent Owner will, however, be prepared to address the substance of the issues Petitioner seeks to raise during the May 24, 2021 telephone conference should the Board so desire.

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From: Nash, Brian C. <brian.nash@pillsburylaw.com>
Sent: Thursday, May 20, 2021 12:12 PM
To: Jay Kesan <jay@jaykesan.com>; Trials <Trials@USPTO.GOV>
Cc: Finkel, Evan <evan.finkel@pillsburylaw.com>; Hindman, Matthew W. <matthew.hindman@pillsburylaw.com>; Gartman, Cody A. <cody.gartman@pillsburylaw.com>; Intel-SRC <Intel-SRC@Pillsburylaw.com>; Cecil Key <CKey@dimuro.com>; Ari Rafilson (arafilson@shorechan.com) <arafilson@shorechan.com>; Henning Schmidt <hschmidt@dimuro.com>
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Dear Board,

To clarify Petitioner's position, Petitioner has repeatedly asked Patent Owner to identify what exactly it is requesting from the Board, but Patent Owner would not do so beyond suggesting that it might want to take depositions if the Motion to Supplement is granted. Patent Owner's stated "request" below is similarly noncommittal. Petitioner is not opposed to a conference with the Board, but Petitioner is not able to take a position on PO's request without knowing what is being requested.

Patent Owner has had ample opportunity to take depositions and to prepare its Response and Motion to Amend within the time frame provided by the Scheduling Order (i.e., by May 26), and the parties have been aware of the timing on the Motion to Supplement for over a month.

Best regards,

Brian Nash
Counsel for Petitioner Intel Corporation

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From: jay jaykesan.com <jay@jaykesan.com>

Sent: Tuesday, May 18, 2021 10:15 PM

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Subject: Intel v. FG SRC, IPR2020-01449: Patent Owner's Request to Schedule a Conference Call

Your Honors:

Patent Owner requests a conference call with the Board as soon as possible to obtain the Board's guidance regarding the current schedule in light of the Board's pending decision on Petitioner's Motion to Submit Supplemental Information.

In accordance with the Board's Order governing the Conduct of the Proceeding (Paper No. 18), briefing by both parties on Petitioner's Motion to Submit Supplemental Information is complete as of May 12, 2021.

Currently, Patent Owner's Response and Motion to Amend are due on May 26, 2021, and whether Patent Owner will seek additional depositions at this stage depends on the Board's ruling on Petitioner's Motion to Submit Supplemental Information.

As such, Patent Owner respectfully seeks guidance from the Board on when a ruling on Petitioner's Motion might be expected. In addition, Patent Owner may seek an extension of the due date for its Patent Owner Response and Motion to Amend based on the guidance that we receive from the Board.

Petitioner has indicated that it may or may not oppose this request. Accordingly, in light of the upcoming May 26, 2021 deadline, Patent Owner respectfully requests a conference call at the Board's earliest convenience to address this request.

Best regards.

--Jay Kesan.
Counsel for Patent Owner, FG SRC.

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