

**From:** [Henning Schmidt](#)  
**To:** [Trials](#)  
**Cc:** [Nash, Brian C.](#); [Intel-SRC](#); [Cecil Key](#); [Ari Rafilson \(arafilson@shorechan.com\)](#); [Henning Schmidt](#); [Jay Kesana](#)  
**Subject:** IPR2020-01449 -- Request for Authorization to Obtain Additional Discovery  
**Date:** Friday, June 18, 2021 12:23:49 AM

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Your Honors,

Patent Owner requests permission from the Board to file a Motion for Additional Discovery pursuant to 37 C.F.R. § 42.52. Specifically, Patent Owner seeks to obtain a subpoena for testimony pursuant to 35 U.S.C. § 24 to the primary author, Mr. Zhang, of the primary prior art reference (*Zhang*, EX1003) underlying every ground for invalidation for all of the challenged claims. Patent Owner requests a waiver of the requirement to file a formal Motion for Additional Discovery in order to obtain the requested discovery in time for the Patent Owner Response or Patent Owner Sur-reply.

Petitioner has indicated that it opposes Patent Owner's request. Accordingly, Patent Owner respectfully requests a conference call at the Board's earliest convenience. Patent Owner has conferred with Petitioner, and both parties are available for a call at the following times:

- Monday 6/21: between 12-1pm ET
- Tuesday 6/22: after 3pm ET
- Wednesday 6/23: between 2:30pm to 4pm ET

Sincerely,

Henning Schmidt, Esq  
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Counsel for Patent Owner FG SRC LLC

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