

From: [Eric Lucas](#)
To: trials@uspto.gov
Cc: "[Scheibeler, John](#)"; [Lamberson, Jonathan](#); [Brzezinski, Ashley](#); [Kiernan, Hallie](#); [W&C Stratos Audio IPR](#); [VW-Stratos](#)
Bcc: [Eric Lucas](#)
Subject: Volkswagen v. StratosAudio IPR2021-00712, -00716, -00718, -00719, -00720, -00721
Date: Friday, September 3, 2021 3:51:00 PM

To the Honorable Board:

Petitioner requests leave to file a 5-page reply to each of Patent Owner's Preliminary Responses, to address the arguments that Patent Owner presented regarding § 314(a) discretionary denial, and to affirmatively stipulate that, if this IPR is instituted, Petitioner will not assert in Western District of Texas Case No. 6:20-cv-01131-ADA any ground of invalidity presented in this IPR. Petitioner consents to the submission of a 5-page sur-reply by Patent Owner.

Petitioner has conferred with Patent Owner, and Patent Owner indicated that it opposes Petitioner's request. The parties are available at the following dates/times to the extent the Board would like to conduct a teleconference:

September 7: 9:30 am – 12:30 pm and after 3 pm
September 8: 9:30 am – 10:30 am and after 3 pm
September 9: 9:30 am – 3 pm.

Respectfully submitted,
E.S.L.

Eric S. Lucas

Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022-6069
D +1.212.848.4955 | F +1.646.848.4955
eric.lucas@shearman.com | www.shearman.com