

**From:** [Enrique Iturralde](#)  
**To:** [Briers, Zachary](#); [Takahashi, Heather](#); [Moore, Mica](#); [Gray, Robin](#); [Ling, Vinny](#); [colinj@gtlaw.com](#); [edlinr@gtlaw.com](#); [kapadiav@gtlaw.com](#)  
**Cc:** [RFCYBER](#); [sbaxter@mckoolsmith.com](#); [jtruelove@mckoolsmith.com](#)  
**Subject:** RE: RFCyber v. Google (LEAD CASE)  
**Date:** Tuesday, April 20, 2021 6:23:19 PM  
**Attachments:** [image001.png](#)

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Hi Zach,

We are asking for the extension as a professional courtesy. We have about 15 cases set for scheduling conferences on the same date (with the same deadlines) and we have a jury trial in Marshall set for May 10.

Regards,  
Enrique

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**From:** Briers, Zachary <zachary.briers@mto.com>  
**Sent:** Tuesday, April 20, 2021 8:47 PM  
**To:** Enrique Iturralde <eiturralde@fabricantllp.com>; Takahashi, Heather <Heather.Takahashi@mto.com>; Moore, Mica <Mica.Moore@mto.com>; Gray, Robin <Robin.Gray@mto.com>; Ling, Vinny <Vinny.Ling@mto.com>; colinj@gtlaw.com; edlinr@gtlaw.com; kapadiav@gtlaw.com  
**Cc:** RFCYBER <RFCYBER@fabricantllp.com>; sbaxter@mckoolsmith.com; jtruelove@mckoolsmith.com  
**Subject:** RE: RFCyber v. Google (LEAD CASE)

Enrique,

In evaluating your proposal, it would be helpful to know the reason, if any, for the requested extension.

Thanks,

Zach

Zachary M. Briers | Tel: 213.683.9121 | [vcard](#)

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**From:** Enrique Iturralde <[eiturralde@fabricantllp.com](#)>  
**Sent:** Tuesday, April 20, 2021 5:40 PM  
**To:** Takahashi, Heather <[Heather.Takahashi@mto.com](#)>; Moore, Mica <[Mica.Moore@mto.com](#)>; Gray, Robin <[Robin.Gray@mto.com](#)>; Ling, Vinny <[Vinny.Ling@mto.com](#)>; Briers, Zachary <[zachary.briers@mto.com](#)>; [colinj@gtlaw.com](#); [edlinr@gtlaw.com](#); [kapadiav@gtlaw.com](#)  
**Cc:** RFCYBER <[RFCYBER@fabricantllp.com](#)>; [sbaxter@mckoolsmith.com](#); [jtruelove@mckoolsmith.com](#)  
**Subject:** RFCyber v. Google (LEAD CASE)

Counsel,

Today's scheduling order sets an April 28 deadline for Plaintiff's P.R. 3-1 and P.R. 3-2 disclosures (infringement contentions).

Please let us know whether Defendants agree to a mutual 3-week extension to the following deadlines in the Court's Scheduling Order: Plaintiff's P.R. 3-1 & P.R. 3.2 disclosures and Defendants' P.R. 3-3 & 3-4 disclosures (invalidity contentions). This proposal would extend the deadline for Plaintiff's P.R. 3-1 and 3-2 disclosures to May 19, 2021.

Regards,  
Enrique



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