

**From:** [Eric Lucas](#)  
**To:** [trials@uspto.gov](mailto: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

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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

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