

From: [Jorde Scott](#)
To: [Trials](#)
Cc: [Tom Dunham](#); [Elizabeth O'Brien](#); [michael.lewis@listonabramson.com](#); [ari.jaffess@listonabramson.com](#); [Craig Tolliver](#); [jbartlett@mkwllp.com](#); [VMa@mkwllp.com](#); [rhuang@mkwllp.com](#); [ron.abramson@listonabramson.com](#); [John Heuton](#)
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board
Date: Tuesday, May 17, 2022 5:11:08 PM

Dear Board:

IPR2022-00861 and IPR2022-00862 Petitioner Code200 understands that Patent Owner has reached a settlement with IPR2021-01492 and IPR2021-01493 Petitioner NetNut and that Patent Owner and NetNut may soon or have sought permission to file a Motion to Terminate. Petitioner Code200 has not settled with Patent Owner and does not join in any Motion to Terminate. Accordingly, to the extent the Board grants a Motion to Terminate in IPR2021-01492 and IPR2021-01493, in view of the related IPR2022-00861 and IPR2022-00862 Petitions and accompanying Motions for Joinder filed before such motions and that remain pending, Petitioner Code200 respectfully requests that any termination be as to Petitioner NetNut and the Board "exercise the discretion afforded under 35 U.S.C. § 317(a) to decline, at this time, to terminate these proceedings with respect to Patent Owner." See IPR2015-00314 (Paper 20) at 3. The Board may then vacate the existing scheduling orders and "revisit scheduling for these proceedings after decisions on the joinder motions are made in the related proceedings." *Id.*

Petitioner Code200 will make itself available for a conference call to discuss at the Board's convenience.

Regards,

George T. "Jorde" Scott
Reg. No. 62,859
Charhon Callahan Robson & Garza
3333 Lee Parkway, Suite 460
Dallas, Texas 75219
469-587-7264
jscott@ccrglaw.com

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From: Trials <Trials@USPTO.GOV>
Sent: Monday, May 16, 2022 11:31 AM
To: Trials <Trials@USPTO.GOV>; John Heuton <jheuton@ccrglaw.com>
Cc: tomd@ruyakcherian.com; elizabetho@ruyakcherian.com; michael.lewis@listonabramson.com; ari.jaffess@listonabramson.com; Jorde Scott <jscott@ccrglaw.com>; Craig Tolliver <ctolliver@ccrglaw.com>; jbartlett@mkwllp.com; VMa@mkwllp.com; rhuang@mkwllp.com; ron.abramson@listonabramson.com
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

Counsel,

Tomorrow's call has been cancelled and will be rescheduled.

Regards,

Andrew Kellogg,
Supervisory Paralegal
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571)272-7822

From: Trials <Trials@USPTO.GOV>
Sent: Thursday, May 12, 2022 10:30 AM
To: John Heuton <jheuton@ccrqlaw.com>; Trials <Trials@USPTO.GOV>
Cc: tomd@ruyakcherian.com; elizabetho@ruyakcherian.com; michael.lewis@listonabramson.com; ari.jaffess@listonabramson.com; Jorde Scott <jscott@ccrqlaw.com>; Craig Tolliver <ctolliver@ccrqlaw.com>; jbartlett@mkwllp.com; VMa@mkwllp.com; rhuang@mkwllp.com; ron.abramson@listonabramson.com
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

Counsel: A conference call has been scheduled for Tuesday, May 17 at 10:00 AM ET. The dial-in information is below:

866-642-9503	Password 2376212#
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Thank you,

Maria King
Deputy Chief Clerk for Trials
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
703-756-1288

From: John Heuton <jheuton@ccrqlaw.com>
Sent: Wednesday, May 11, 2022 1:38 PM
To: Trials <Trials@USPTO.GOV>
Cc: tomd@ruyakcherian.com; elizabetho@ruyakcherian.com; michael.lewis@listonabramson.com; ari.jaffess@listonabramson.com; Jorde Scott <jscott@ccrqlaw.com>; Craig Tolliver <ctolliver@ccrqlaw.com>; jbartlett@mkwllp.com; VMa@mkwllp.com; rhuang@mkwllp.com; ron.abramson@listonabramson.com
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

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Thank you. Counsel for all parties have conferred and propose the following times on **Tuesday, May 17, 2022** in order of preference:

1. 4:00 pm (EDT)
2. 10:00 am (EDT)
3. 10:30 am (EDT)

Best regards,

John Heuton (Counsel for Metacluster)
Of Counsel
Charhon Callahan Robson & Garza, PLLC
3333 Lee Parkway, Suite 460
Dallas, Texas 75219
Phone: (214) 521-6400
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jheuton@ccrglaw.com

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From: Trials <Trials@USPTO.GOV>
Sent: Wednesday, May 11, 2022 11:35 AM
To: ron.abramson@listonabramson.com; John Heuton <jheuton@ccrglaw.com>
Cc: tomd@ruyakcherian.com; elizabetho@ruyakcherian.com; michael.lewis@listonabramson.com; ari.jaffess@listonabramson.com; Jorde Scott <jscott@ccrglaw.com>; Craig Tolliver <ctolliver@ccrglaw.com>; jbartlett@mkwllp.com; VMa@mkwllp.com; Trials <Trials@USPTO.GOV>; rhuang@mkwllp.com
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

Counsel, today's conference call at 2 PM is cancelled. We await a response to our email requesting alternate dates for next week.

Thank you,
Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, May 10, 2022 8:07 AM
To: Ronald Abramson <ron.abramson@listonabramson.com>; Trials <Trials@USPTO.GOV>; John Heuton <jheuton@ccrqlaw.com>
Cc: Tom Dunham <tomd@ruyakcherian.com>; Elizabeth O'Brien <elizabetho@ruyakcherian.com>; M. Michael Lewis <michael.lewis@listonabramson.com>; Ari J. Jaffess <ari.jaffess@listonabramson.com>; Jorde Scott <jscott@ccrqlaw.com>; Craig Tolliver <ctolliver@ccrqlaw.com>; Jason Bartlett <jbartlett@mkwllp.com>; Vincent Ma <VMa@mkwllp.com>; Ray Huang <rhuang@mkwllp.com>
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

Counsel: Please meet and confer and provide us with three times on Monday, May 16th or Tuesday, May 17th, that all parties will be available for a conference call.

Thank you,

Maria King
Deputy Chief Clerk for Trials
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
703-756-1288

From: Ronald Abramson <ron.abramson@listonabramson.com>
Sent: Monday, May 9, 2022 3:56 PM
To: Trials <Trials@USPTO.GOV>; John Heuton <jheuton@ccrqlaw.com>
Cc: Tom Dunham <tomd@ruyakcherian.com>; Elizabeth O'Brien <elizabetho@ruyakcherian.com>; M. Michael Lewis <michael.lewis@listonabramson.com>; Ari J. Jaffess <ari.jaffess@listonabramson.com>; Jorde Scott <jscott@ccrqlaw.com>; Craig Tolliver <ctolliver@ccrqlaw.com>; Jason Bartlett <jbartlett@mkwllp.com>; Vincent Ma <VMa@mkwllp.com>; Ray Huang <rhuang@mkwllp.com>
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

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Thank you. However, the parties in IPR2021-00458 and IPR2021-00465 (same patent owner, same

petitioner as in IPR2021-01492 and IPR2021-01493) have a deposition scheduled during the same time on May 11.

From: Trials <Trials@USPTO.GOV>
Sent: Monday, May 9, 2022 3:51 PM
To: John Heuton <jheuton@ccrglaw.com>; Trials <Trials@USPTO.GOV>
Cc: Tom Dunham <tomd@ruyakcherian.com>; Elizabeth O'Brien <elizabetho@ruyakcherian.com>; Ronald Abramson <ron.abramson@listonabramson.com>; M. Michael Lewis <michael.lewis@listonabramson.com>; Ari J. Jaffess <ari.jaffess@listonabramson.com>; Jorde Scott <jscott@ccrglaw.com>; Craig Tolliver <ctolliver@ccrglaw.com>; Jason Bartlett <jbartlett@mkwllp.com>; Vincent Ma <VMa@mkwllp.com>; Ray Huang <rhuang@mkwllp.com>
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

Counsel: A conference call with the panel and the parties has been scheduled for Wednesday, May 11 at 2:00 PM ET. The dial-in information is below:

866-642-9503	Passcode 2376212#
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Thank you,

Maria King
Deputy Chief Clerk for Trials
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
703-756-1288

From: John Heuton <jheuton@ccrglaw.com>
Sent: Wednesday, May 4, 2022 4:33 PM
To: Trials <Trials@USPTO.GOV>
Cc: Tom Dunham <tomd@ruyakcherian.com>; Elizabeth O'Brien <elizabetho@ruyakcherian.com>; ron.abramson@listonabramson.com; michael.lewis@listonabramson.com; ari.jaffess@listonabramson.com; Jorde Scott <jscott@ccrglaw.com>; Craig Tolliver <ctolliver@ccrglaw.com>; Jason Bartlett <jbartlett@mkwllp.com>; Vincent Ma <VMa@mkwllp.com>; Ray Huang <rhuang@mkwllp.com>
Subject: RE: IPR2021-01492; -01493; IPR2022-00861; -00862; -00915; -00916 -- Initial Conference Call with the Board

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Ms. King,
Thank you for your email. Regarding IPR2022-00861, it appears that the motion was expunged in

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