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Subject: IPR2023-00480 and -00481: Request to Expunge and Replace Ex. 2050
Date: Wednesday, March 13, 2024 3:03:06 PM

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Case Nos. IPR2023-00480 and IPR2023-00481
U.S. Patent Nos. 7,713,947 and 8,377,903

Dear Honorable Board:

Patent Owner writes to respectfully request the expungement and substitution of Ex. 2050 in IPR2023-00480 and IPR2050-00481. Patent Owner has conferred with Petitioner, and it does not oppose this request.

It recently came to Patent Owner's attention that Ex. 2050 was inadvertently filed, under seal, with three paragraphs of unredacted privileged information from a third-party that is subject to a common-interest with Patent Owner. Patent Owner seeks to replace Ex. 2050 with a substitute exhibit, which redacts the privileged information. The privileged material is not relevant to the issues in these proceedings. If the Board authorizes this expungement and substitution, we propose to file a substitute exhibit under seal having the three paragraphs redacted.

Patent Owner respectfully asks that the Honorable Board grant this request. Should the Honorable Board desire further information, Patent Owner seeks permission to submit a two-page motion further explaining the reasons for this request along with a copy of the proposed redacted exhibit, and/or discuss in a teleconference at the Board's convenience.

Respectfully submitted,

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