

From: [Megan Raymond](#)
To: [Trials](#)
Cc: [white-ptab@perkinscoie.com](#); [Beel, Bryan D. \(POR\)](#); [greb-ptab@perkinscoie.com](#); [prochnow-ptab@perkinscoie.com](#); [jones-ptab@perkinscoie.com](#); [tietz-ptab@perkinscoie.com](#); [lembo-ptab@perkinscoie.com](#); [Semaglutide-Ozempic@perkinscoie.com](#); [Novo-Semaglutide-IPR@groombridgewu.com](#)
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Patent Owner respectfully requests a call seeking leave to file a motion to waive the word counts in the Patent Owner Response, Petitioner Reply, and Patent Owner Sur-Reply. The Parties are in agreement, pending the Board's approval, that the word count in the Patent Owner Response and Petitioner Reply each be increased by 4,000 words, and the word count in the Patent Owner Sur-Reply be increased by 2,000 words. The increase in word count is being sought to address the arguments Patent Owner expects to include in its Patent Owner Response, including (1) swearing behind certain of Petitioner's asserted references and (2) objective indicia of non-obviousness.

The parties are available for the requested call Monday December 18 from 9-2 or 3-5 or Tuesday December 19 from 9-11 or 12-2 or 3:30-5, or as the Board may otherwise direct.

Sincerely,
Megan Raymond
Attorney for Patent Owner

Megan F. Raymond
Groombridge, Wu, Baughman & Stone LLP
801 17th St. NW Suite 1050
Washington, DC 20006
megan.raymond@groombridgewu.com
M +1 617-388-5878
O +1 202-505-5878

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