

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](#)

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

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](#)

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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