

# EXHIBIT B



**Re: Blitzsafe Claim Construction Briefing**

**Joe Beauchamp** to: Lambrianakos, Peter  
3-3835

05/03/2016 04:38 PM

Cc: "H. Albert Liou", BlitzsafeTX, "Brian K. Shelton", "Deron R. Dacus",  
"Fadi N. Kiblawi", Randy Akin, Joseph Melnik, Joseph Beauchamp,  
"Jeffrey S. Patterson", "John F. Rabena", "Matthew D. Satchwell",

Peter,

The PTAB was not asked by Unified Patents to find any claim term indefinite. As I suspect you know, the PTAB does not have the power to invalidate a claim for indefiniteness in an IPR proceeding. We intend to brief this issue.

Thanks,

Joe

Joseph M. Beauchamp  
Partner  
[JONES DAY® - One Firm Worldwide<sup>SM</sup>](#)  
717 Texas, Suite 3300  
Houston, Texas 77002  
Office +1.832.239.3835  
Mobile +1.713.826.5726  
jbeauchamp@jonesday.com

"Lambrianakos, Peter"

Joe, Thanks for your call yesterday concerni...

04/27/2016 04:00:49 PM

From: "Lambrianakos, Peter" <PLambrianakos@brownrudnick.com>  
To: Joseph Beauchamp <Joseph.Beauchamp@esquiresolutions.com>  
Cc: BlitzsafeTX <BlitzsafeTX@brownrudnick.com>, "H. Albert Liou" <aliou@jonesday.com>, "Joseph M. Beauchamp" <jbeauchamp@jonesday.com>, Joseph Melnik <jmelnik@jonesday.com>, Randy Akin <gra@randyakin.com>, "Matthew D. Satchwell" <matthew.satchwell@dlapiper.com>, "Patrick S. Park" <patrick.park@dlapiper.com>, "Paul R. Steadman" <paul.steadman@dlapiper.com>, "Brian K. Shelton" <bshelton@sughrue.com>, "Fadi N. Kiblawi" <fkiblawi@sughrue.com>, "J. Thad Heartfield" <thad@heartfieldlawfirm.com>, "John F. Rabena" <jrabena@sughrue.com>, "Margaret M. Welsh" <mwelsh@sughrue.com>, "William H. Mandir" <wmandir@sughrue.com>, "Jeffrey S. Patterson" <jpatterson@hdbdlaw.com>, "Sean N. Hsu" <shsu@hdbdlaw.com>, "Theresa M. Dawson" <tdawson@hdbdlaw.com>, "Deron R. Dacus" <ddacus@dacusfirm.com>, "Michael J. Lennon" <mlennon@kenyon.com>, Peter Kerr <pkerr@dacusfirm.com>, Sheila Mortazavi <smortazavi@kenyon.com>, "Susan A. Smith" <ssmith@kenyon.com>  
Date: 04/27/2016 04:00 PM  
Subject: Blitzsafe Claim Construction Briefing

Joe,

Thanks for your call yesterday concerning claim construction briefing. We have considered your proposal but have decided that we will not consent to any changes in the briefing schedule. In light of the PTAB's construction of "integration subsystem" and our upcoming claim construction brief, please

advise as soon as possible whether defendants will persist in their indefiniteness argument. Thank you.

Regards,

Peter



**Peter Lambrianakos**

Partner  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212.209.4813  
F: 212.938.2981  
plambrianakos@brownrudnick.com  
[www.brownrudnick.com](http://www.brownrudnick.com)

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\*\*\*\*\*[ attachment "decision denying institution-19.pdf" deleted by Joe Beauchamp/JonesDay]

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