

# EXHIBIT D

**From:** [Liang, Mark](#)  
**To:** [Enrique Iturralde](#); [#Google-AGIS](#); [DLBBSamsung\\_AGIS\\_@BakerBotts.com](#); [Melissa Smith](#)  
**Cc:** [AGIS](#); [jtruelove@mckoolsmith.com](#); [sbaxter@mckoolsmith.com](#)  
**Subject:** RE: AGIS-Samsung EDTX - supplemental claim construction for remote control  
**Date:** Wednesday, December 6, 2023 1:21:31 PM  
**Attachments:** [image001.png](#)

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Enrique – We oppose AGIS’s motion and request for supplemental claim construction for “remote control” in this AGIS/Samsung II EDTX case.

Thanks,  
Mark

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**From:** Enrique Iturralde <eiturralde@fabricantllp.com>  
**Sent:** Tuesday, December 5, 2023 11:29 AM  
**To:** Liang, Mark <mliang@omm.com>; [#Google-AGIS](#) <GoogleAGIS@omm.com>; [DLBBSamsung\\_AGIS\\_@BakerBotts.com](#); [Melissa Smith](#) <melissa@gillamsmithlaw.com>  
**Cc:** [AGIS](#) <AGIS@fabricantllp.com>; [jtruelove@mckoolsmith.com](#); [sbaxter@mckoolsmith.com](#)  
**Subject:** RE: AGIS-Samsung EDTX - supplemental claim construction for remote control

[EXTERNAL MESSAGE]

Mark,

Following up on this.

Regards,  
Enrique

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**From:** Enrique Iturralde  
**Sent:** Saturday, December 2, 2023 6:14 PM  
**To:** [mliang@omm.com](#); [#Google-AGIS](#) <[GoogleAGIS@omm.com](#)>; [DLBBSamsung\\_AGIS\\_@BakerBotts.com](#); [Melissa Smith](#) <[melissa@gillamsmithlaw.com](#)>  
**Cc:** [AGIS](#) <[AGIS@fabricantllp.com](#)>; [Jennifer Truelove](#) <[jtruelove@mckoolsmith.com](#)>; [Sam Baxter](#) <[sbaxter@mckoolsmith.com](#)>  
**Subject:** AGIS-Samsung EDTX - supplemental claim construction for remote control

Counsel:

Based on your NDCA position that the term “remote control” of the ‘829 Patent requires claim construction, AGIS intends to file a motion in the AGIS v. Samsung EDTX action requesting supplemental claim construction proceedings to address the term “remote control.” Please let us know if Defendants oppose or would like to join the motion.

We believe it would be helpful to propose a schedule in the motion. Please let us know if Defendants agree to the following schedule:

December 15, 2023 - Exchange of Preliminary Claim Construction and Extrinsic Evidence  
December 22, 2023 – Plaintiff’s opening claim construction brief (up to ten pages)  
January 5, 2024 – Defendants’ responsive claim construction brief (up to ten pages)  
January 12 – Plaintiff’s reply claim construction brief (up to six pages)  
TBD – Second Markman Hearing for supplemental claim construction of remote control term

We would like to file this motion by Wednesday, Dec 6. We are available to confer on this request during our scheduled conference call on Monday, Dec 4 at 1pm Eastern. If you require additional time to consider, please provide your availability to confer on or before Dec 6.

Regards,  
Enrique



**Enrique W. Iturralde**

Partner

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