

Exhibit 2

Al-Marzoog, Sami (DC)

From: Yeh, Thomas (LA)
Sent: Sunday, June 12, 2022 11:20 PM
To: Michalik, John M.; Weinand, Paul (BN); #C-M PMIEDVA - LW TEAM
Cc: RJREDVA; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

John – we disagree the issue is resolved. We maintain our objections to slides 19, 20, 21, 22, 23, 30, 31, 33, and 34.

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Sunday, June 12, 2022 11:00 PM
To: Yeh, Thomas (LA) <Thomas.Yeh@lw.com>; Weinand, Paul (BN) <Paul.Weinand@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

Thomas - -

The image in slide 21 is from an animation in powerpoint that uses the image from the paragraphs in Dr. Suhling's rebuttal report that I previously identified. It is not a physical replica or physical demonstrative. Both parties have relied extensively on animations so far in their demonstratives, so I expect this resolves the issue.

John M. Michalik
Partner
[JONES DAY® - One Firm WorldwideSM](#)
110 North Wacker Drive
Suite 4800
Chicago, Illinois 60606
Office +1.312.269.4215
Mobile +1.312.315.5926
jmichalik@jonesday.com

From: Thomas.Yeh@lw.com <Thomas.Yeh@lw.com>
Sent: Sunday, June 12, 2022 10:54 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; Paul.Weinand@lw.com; pmiedva.lwteam@lw.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

**** External mail ****

John,

You identified several paragraphs below. Which one in particular? And am I correct to understand that the inset picture *as it appears on slide 21* was not in fact disclosed in Dr. Suhling's rebuttal expert report?

First, by "mapped onto a 3-D object for presentation," is that referring an enlarged physical replica?

Second, am I correct that what you have sent is a photograph of that physical replica?

Thanks,
Thomas

Thomas W. Yeh

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100 | Los Angeles, CA 90071-1560
D: +1.213.891.8050

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Sunday, June 12, 2022 10:48 PM
To: Yeh, Thomas (LA) <Thomas.Yeh@lw.com>; Weinand, Paul (BN) <Paul.Weinand@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

Thomas - -

It is the image from the paragraph I identified in my email below mapped onto a 3-D object for presentation.

John M. Michalik
Partner
[JONES DAY® - One Firm WorldwideSM](http://www.jonesday.com)
110 North Wacker Drive
Suite 4800
Chicago, Illinois 60606
Office +1.312.269.4215
Mobile +1.312.315.5926
jmichalik@jonesday.com

From: Thomas.Yeh@lw.com <Thomas.Yeh@lw.com>
Sent: Sunday, June 12, 2022 10:28 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; Paul.Weinand@lw.com; pmiedva.lwteam@lw.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

**** External mail ****

John, are you representing that the inset image on slide 21 is the same photograph disclosed in paragraph 76 of Dr. Suhling's report? If not, which paragraph of Dr. Suhling's rebuttal report, specifically, was the inset photograph on slide 21 disclosed in? Please confirm. We look forward to hearing from you by 11 PM ET. Thanks.

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Sunday, June 12, 2022 10:20 PM
To: Yeh, Thomas (LA) <Thomas.Yeh@lw.com>; Weinand, Paul (BN) <Paul.Weinand@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

Thomas - -

During our meet and confer, the only objection you raised to the images in Dr. Suhling's slides was in slides 19-23, 30-31, and 33-34 and related to the SEM image of the heater. That image was disclosed in Paragraphs 76, 96, 98, and 201-207 of Dr. Suhling's rebuttal report. That image also formed the basis of PX-587. With respect to your second recent email, the SEM image of the heater was not produced in native format. In response to your third recent email, Dr. Suhling discussed 7:21025 and Figure 1 of the '265 patent (cited on slide 18) at Paragraphs 39-40 of his rebuttal report.

John M. Michalik
Partner
[JONES DAY® - One Firm WorldwideSM](http://www.jonesday.com)
110 North Wacker Drive
Suite 4800
Chicago, Illinois 60606
Office +1.312.269.4215
Mobile +1.312.315.5926
jmichalik@jonesday.com

From: Thomas.Yeh@lw.com <Thomas.Yeh@lw.com>
Sent: Sunday, June 12, 2022 9:46 PM
To: Paul.Weinand@lw.com; Michalik, John M. <jmichalik@JonesDay.com>; pmiedva.lwteam@lw.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

**** External mail ****

Counsel – thank you for the meet and confer. Setting aside our disagreement over whether the photographs in Dr. Suhling's deck are proper demonstratives (we believe they are not), you also represented that each of the photographs appear in Dr. Suhling's Rebuttal Expert Report, apart from the color, scale, etc. annotations. Please confirm, in writing, that each of the photographs in Dr. Suhling's demonstratives are also in Dr. Suhling's rebuttal expert report by 10:30 PM ET, and that the slide deck includes no new photographs. As always, we're happy to meet and confer further in an effort to streamline the disputes. Thanks.

From: Weinand, Paul (BN) <Paul.Weinand@lw.com>
Sent: Sunday, June 12, 2022 8:28 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>
Cc: RJREDVA <RJREDVA@jonesday.com>; Charles Molster <cmolster@molsterlaw.com>
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

John,

Please see the below objections:

Slide 17 – Contrary to claim construction order
Slide 18 – Contrary to claim construction order, not in expert report
Slide 19 – Undisclosed exhibit, improper demonstrative, 402/403
Slide 20 – Undisclosed exhibit, improper demonstrative, 402/403
Slide 21 – Undisclosed exhibit, improper demonstrative, 402/403
Slide 22 – Undisclosed exhibit, improper demonstrative, 402/403
Slide 23 – Undisclosed exhibit, improper demonstrative, 402/403
Slide 30 – Undisclosed exhibit, improper demonstrative, 402/403

Slide 33 – Undisclosed exhibit, improper demonstrative, 402/403

Slide 34 -- Undisclosed exhibit, improper demonstrative, 402/403

Thanks,
Paul

Paul Weinand

LATHAM & WATKINS LLP

200 Clarendon Street | Boston, MA 02116
D: +1.617.880.4580 | M: +1.609.558.8101

From: Michalik, John M. <jmichalik@JonesDay.com>

Sent: Sunday, June 12, 2022 7:04 PM

To: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>

Cc: RJREDVA <RJREDVA@jonesday.com>; Charles Molster <cmolster@molsterlaw.com>

Subject: Case No. 1:20-cv-00393-LO-TCB (Reynolds's June 12 trial disclosure)

Counsel - -

Reynolds discloses the attached demonstratives that may be used with Dr. Suhling.

John M. Michalik
Partner

[JONES DAY® - One Firm WorldwideSM](#)

110 North Wacker Drive
Suite 4800

Chicago, Illinois 60606

Office +1.312.269.4215

Mobile +1.312.315.5926

jmichalik@jonesday.com

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, disclosure, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies including any attachments.

Latham & Watkins LLP or any of its affiliates may monitor electronic communications sent or received by our networks in order to protect our business and verify compliance with our policies and relevant legal requirements. Any personal information contained or referred to within this electronic communication will be processed in accordance with the firm's privacy notices and Global Privacy Standards available at www.lw.com.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.