

From: Adkins, Robin <RAdkins@ktslaw.com>

Sent: Wednesday, January 17, 2024 2:32 PM

To: Trials <Trials@USPTO.GOV>

Cc: Dutta, Sanjeet K <sdutta@goodwinlaw.com>; Kline, Douglas J <dkline@goodwinlaw.com>; Birbach, Naomi <nbirbach@goodwinlaw.com>; Reddy, Srikanth K <sreddy@goodwinlaw.com>; Alemanni, John <jalemanni@ktslaw.com>; Sanders, Carl <csanders@ktslaw.com>; Morlock, Michael <MMorlock@ktslaw.com>; Dabbieri, Courtney <CDabbieri@ktslaw.com>; Anderson, Andie <andie.anderson@ktslaw.com>; Reed, David <DReed@ktslaw.com>; Adkins, Robin <RAdkins@ktslaw.com>; Meyer, Matthew <MMeyer@ktslaw.com>

Subject: Samsung/MRI - IPR2023-00221 ('142 Patent), IPR2023-00254 ('740 Patent) and IPR2023-00255 ('287 Patent)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Trials,

On Friday, January 12, 2024, Patent Owner and Petitioners submitted renewed motions to seal certain exhibits filed with the Patent Owner Response in IPR2023-00221, -00254, and -00255. With the renewed motions to seal, Patent Owner submitted a new public Exhibit 2016 that was excerpted to remove highly confidential information such that it no longer needs to be sealed. However, because the original sealed version of Ex. 2016 remains on the record, there are now erroneously two copies of the same Exhibit.

Patent Owner respectfully requests that the Board expunge "Exhibit 2016 – CONFIDENTIAL – Deposition Tr. Chris Bolton" which was filed Sealed in its Entirety- Parties and Board Only from the record. Patent Owner has conferred with Petitioner. Petitioner does not oppose this request.

Sincerely,
Robin Adkins
Paralegal to Lead Counsel John Alemanni



Robin Adkins

Paralegal

radkins@ktslaw.com

Kilpatrick Townsend & Stockton LLP

1001 West Fourth Street | Winston-Salem, NC 27101-2400

T 336 607 7481 | M 301 751 3777 | F 336 734 2754

www.ktslaw.com | [vCard](#)

Please note that my email address has changed. Please consider adding this new email to your safe senders list, downloading my vCard or sending me an email using the address in my signature line. To learn more about our new visual identity, please visit us online at www.ktslaw.com.