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December 27, 2022

VIA ECF

Hon. Lee G. Dunst
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza, Room 830
Central Islip, New York 11722

**Re: *Slingshot Printing LLC v. Canon U.S.A., Inc., et ano.*,
Case No. 22-cv-00123 (HG) (LGD) ("*Slingshot I*")**

***Slingshot Printing LLC v. Canon U.S.A., Inc., et ano.*,
Case No. 22-cv-01852 (HG) (LGD) ("*Slingshot II*")**

Dear Judge Dunst:

My firm is co-counsel for defendants Canon U.S.A., Inc. and Canon Solutions America, Inc. (together, "Canon") in the above-referenced actions, *Slingshot I* and *Slingshot II*. We write to request a three-week extension of the temporary stay of *Slingshot II* because Canon needs additional time to initiate *inter partes* review ("IPR") proceedings with respect to two of the three asserted patent claims in *Slingshot II*.

By way of background, on November 2, 2022, Canon filed a letter motion for a stay of *Slingshot I* because it had filed IPR petitions covering every patent claim asserted in *Slingshot I*. (See *Slingshot I*, Dkt. 46; *Slingshot II*, Dkt. 36.) Canon's motion also requested a temporary two-month stay of *Slingshot II* while Canon finalized and filed IPR petitions challenging the asserted patent claims in *Slingshot II*. (*Id.*) In an Order dated December 1, 2022, this Court granted Canon's motion and stayed *Slingshot I* pending the resolution of the *inter partes* review, and temporarily stayed *Slingshot II* until December 30, 2022 to give Canon time to file the remaining IPR petitions. (See *Slingshot I*, Dkt. 52; *Slingshot II*, Dkt. 42.)

Since that time, Canon has worked diligently to finalize the IPR petitions challenging the asserted patent claims in *Slingshot II*. There are three Patents-in-Suit in *Slingshot II*: U.S. Patent Nos. 7,290,864 ("the '864 Patent"), 7,594,708 ("the '708 Patent"), and 7,484,823 ("the '823 Patent"). By December 30, 2022, Canon intends to file an IPR petition with respect to the '864 Patent. Canon is close to finalizing the IPR petitions with respect to the '708 Patent and the '823 Patent, but it needs additional time to do so. Among other reasons, the additional time is needed because Canon's offices in Japan are closed from late-December until early-January. Although the remaining IPR petitions are nearly complete, they cannot be filed without Canon's final review and approval.

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Accordingly, Canon respectfully requests a three-week extension, from December 30, 2022 to January 20, 2023, of the temporary stay of *Slingshot II* so that it may finalize and file IPR petitions with respect to the '708 Patent and the '823 Patent. This is Canon's first request for an extension of the temporary stay of *Slingshot II*.

We thank the Court for its attention to this matter.

Respectfully,
/s/ *Grant A. Shehigian*
Grant A. Shehigian

cc: Counsel of Record (via ECF)