
From: Mead, Lowell <lmead@cooley.com>
Sent: Monday, February 12, 2024 3:37 PM
To: Mason, Geoff
Cc: ben.katzenellenbogen@knobbe.com; _Topia; z/Box-Topia
Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Hi Geoff,

While we appreciate the discussion, we maintain our objections to the requested discovery including objecting to production of the unredacted confidential materials at the PTAB that are subject to the Protective Order entered at the PTAB. If you would like to discuss anything further at this point, please let me know.

Best,

Lowell

Lowell D. Mead
Cooley LLP
Mobile: (650) 520-0788
Office direct: (650) 843-5734

From: Mason, Geoff <gmason@sughrue.com>
Sent: Monday, February 12, 2024 12:30 PM
To: Mead, Lowell <lmead@cooley.com>
Cc: ben.katzenellenbogen@knobbe.com; _Topia <Topia@sughrue.com>; z/Box-Topia <zBoxTopia@cooley.com>
Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

[External]

Lowell,

I hope you had a nice weekend.

Given it's been nearly a week since we spoke, just thought I'd follow up to hear your thoughts on our proposal.

If you'd like to discuss this further, I'm available to talk tomorrow afternoon, as well as Wednesday afternoon.

Best,

Geoff

From: Mason, Geoff <gmason@sughrue.com>
Sent: Tuesday, February 6, 2024 9:36 AM
To: Mead, Lowell <lmead@cooley.com>
Cc: ben.katzenellenbogen@knobbe.com; _Topia <Topia@sughrue.com>; z/Box-Topia <zBoxTopia@cooley.com>
Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Lowell,

Great. I've accepted the invite. Talk to you then.

Best,

Geoff

From: [Mead, Lowell](#)

Sent: Monday, February 5, 2024 10:11 PM

To: [Mason, Geoff](#)

Cc: ben.katzenellenbogen@knobbe.com; [_Topia](#); [z/Box-Topia](#)

Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Geoff,

Thanks – I can do 4:30pm ET on Tuesday. I sent you an invite.

Best,

Lowell

Lowell D. Mead

Cooley LLP

Mobile: (650) 520-0788

Office direct: (650) 843-5734

From: Mason, Geoff <gmason@sughrue.com>

Sent: Monday, February 5, 2024 1:38 PM

To: Mead, Lowell <lmead@cooley.com>

Cc: ben.katzenellenbogen@knobbe.com; [_Topia](#) <Topia@sughrue.com>

Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

[External]

Lowell –

I apologize for the late reply – I had thought I responded to this and calendared it for Monday at 4:30 pm – but upon reaching your voicemail a moment ago I see that my responsive email agreeing to this time never left my outbox.

I am still available this afternoon if you are.

Otherwise please let me know when you can talk tomorrow or Wednesday. I am available between noon and 2 tomorrow Eastern, as well as from 3 o'clock on, and on Wednesday I am available all afternoon my time.

Regards,

Geoff

From: [Mead, Lowell](#)

Sent: Thursday, February 1, 2024 10:45 PM

To: [Mason, Geoff](#)

Cc: ben.katzenellenbogen@knobbe.com; [_Topia](#)

Subject: Re: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

■

Thanks,

Lowell

Lowell Mead
Office 650 843 5734
Mobile 650 520 0788

On Feb 1, 2024, at 7:36 AM, Mason, Geoff <gmason@sughrue.com> wrote:

[External]

Hi Lowell,

Thanks for following up. I had a chance to follow up with the full team very late in the evening yesterday and I'd like to discuss the issues further in view of that. I can be available for this discussion tomorrow at any time during East Coast business hours, or we can look to Monday, where I also can arrange similar flexibility.

Best,

Geoff

From: [Mead, Lowell](#)

Sent: Monday, January 29, 2024 3:21 PM

To: [Mason, Geoff](#)

Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#); ben.katzenellenbogen@knobbe.com

Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Hi Geoff,

Thanks for the call last week. Just to memorialize, we discussed that you would revisit the issues with your team and we could then reconnect and discuss further. I am generally around this week to reconnect at your convenience.

Best,

Lowell

Lowell D. Mead

Cooley LLP
Mobile: (650) 520-0788
Office direct: (650) 843-5734

From: Mason, Geoff <gmason@sughrue.com>

Sent: Thursday, January 25, 2024 8:57 AM

To: Mead, Lowell <lmead@cooley.com>

Cc: [Saliba, Raja](#) <rsaliba@sughrue.com>; [z/Box-Topia](#) <zBoxTopia@cooley.com>; [Feng, Alice](#) <afeng@cooley.com>; [Gibbs, Tracy](#) <tgibbs@cooley.com>; ben.katzenellenbogen@knobbe.com

Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

[External]

That works; I'll call you then.

Regards,

Geoff

From: [Mead, Lowell](#)

Sent: Thursday, January 25, 2024 10:57 AM

To: [Mason, Geoff](#)

Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#); ben.katzenellenbogen@knobbe.com

Subject: Re: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

— — —

Thanks Geoff. How about 1230pm ET today? You can call my mobile then.

Thanks,

Lowell

Get [Outlook for iOS](#)

<image001.png>

From: Mason, Geoff <gmason@sughrue.com>

Sent: Thursday, January 25, 2024 7:20:35 AM

To: Mead, Lowell <lmead@cooley.com>

Cc: Saliba, Raja <rsaliba@sughrue.com>; z/Box-Topia <zBoxTopia@cooley.com>; Feng, Alice <afeng@cooley.com>; Gibbs, Tracy <tgibbs@cooley.com>; ben.katzenellenbogen@knobbe.com <ben.katzenellenbogen@knobbe.com>

Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

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<image002.png>

Hi Lowell,

Thank you for explaining about your trial extending until this past Tuesday and making yourself available to talk today or tomorrow.

I am generally available during East Coast business hours both days other than a meeting out of the office at 2 o'clock today; please let me know what time(s) would work for you to talk either today or tomorrow.

Best,

Geoff

From: [Mead, Lowell](#)
Sent: Tuesday, January 23, 2024 4:43 PM
To: [Mason, Geoff](#)
Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#); ben.katzenellenbogen@knobbe.com
Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Hi Geoff,

Thanks for following up. I can speak with you on Thursday or Friday. As noted, I have been actively in trial on another unrelated matter, and the trial ended up extending into today which is why I had not yet responded. I will be flying back to California tonight and will be pleased to speak with you later this week at your convenience.

Best,

Lowell

Lowell D. Mead

Cooley LLP

Mobile: (650) 520-0788

Office direct: (650) 843-5734

From: Mason, Geoff <gmason@sughrue.com>
Sent: Tuesday, January 23, 2024 4:35 PM
To: Mead, Lowell <lmead@cooley.com>
Cc: Saliba, Raja <rsaliba@sughrue.com>; z/Box-Topia <zBoxTopia@cooley.com>; Feng, Alice <afeng@cooley.com>; Gibbs, Tracy <tgibbs@cooley.com>; ben.katzenellenbogen@knobbe.com
Subject: RE: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

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Lowell,

Given the hour, I gather we aren't going to be meeting today. Also, I realize you were in trial last week, but I will also note that I haven't received any response to either my January 16th email or my January 22nd email attempting to set up a conference on this matter.

Accordingly, please let us know by the close of business tomorrow your availability for a discussion on either Thursday or Friday of this week.

Failing that, we will proceed to move to have the Keefe Subpoena matter and related subpoenas heard before Judge Corley in view of her greater familiarity with this matter, and will indicate that we assume you are opposed given your failure to make yourself available for a meet and confer, including failing to respond to multiple scheduling emails over this past week.

Regards,

Geoff

From: [Mason, Geoff](#)
Sent: Monday, January 22, 2024 1:03 PM
To: [Mead, Lowell](#)
Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#); ben.katzenellenbogen@knobbe.com
Subject: Re: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Lowell,

Following up on the below email, please let us know if tomorrow will work for our conference. I have meetings at 11 am and 1 pm but otherwise am available at any time during east coast business hours.

Regards,

Geoff

On Jan 16, 2024, at 4:26 PM, Mason, Geoff <gmason@sughrue.com> wrote:

Lowell,

Given you will be at trial this week, we can certainly confer next week. I have a minor surgical procedure next Monday but I should be able to confer on Tuesday any time that works for you. Please let me know some times that day that work for you.

Best,

Geoff

From: [Mead, Lowell](#)

Sent: Friday, January 12, 2024 11:44 AM

To: [Mason, Geoff](#)

Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#); ben.katzenellenbogen@knobbe.com

Subject: Re: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Geoff,

Thanks for clarifying. I am out of office traveling today, Monday is the Federal holiday that our firm will be honoring and closed, and the remainder of next week I will be out of the office in trial. So that we can evaluate your request and updated position here and ensure that we properly confer to narrow the issues for the Court to the extent possible, can we please reconnect to confer on January 22 or 23?

Best,

Lowell

Lowell Mead

Office 650 843 5734

On Jan 12, 2024, at 7:58 AM, Mason, Geoff
<gmason@sughrue.com> wrote:

[External]

<image003.png>

Lowell,

As we stated in our opposition to your motion to quash, we are most of all interested in the transcript of Ms. Keefe's deposition and the related exhibits, which were among the documents requested in the original Keefe document subpoena. The subpoena for Ms. Keefe's deposition testimony was served when we were unable to secure the production of these documents. Technically, we will not be entitled to those documents if we prevail over your motion to quash – only Ms. Keefe's deposition itself. We are accordingly going to move to compel these related documents, unless of course you are now willing to produce them in view of our briefing. However, at least as it stands, your brief argues these documents are all irrelevant for all of the same reasons as Ms. Keefe's deposition itself so at this point the parties are plainly at an impasse requiring a motion to compel unless your position has changed.

Aside from this, moreover, we still need to understand whether you are agreeable to having these matters heard before Judge Corley. Please advise us by the close of business Monday if so. If we do not hear from you before then, we will assume you are opposed and will proceed with motion practice accordingly.

Best regards,

Geoff

From: [Mead, Lowell](#)
Sent: Thursday, January 11, 2024 3:48 PM
To: [Mason, Geoff](#)

Cc: [Saliba, Raja](#); [z/Box-Topia](#); [Feng, Alice](#); [Gibbs, Tracy](#);
ben.katzenellenbogen@knobbe.com

Subject: Re: Case 3:23-mc-80307-AGT In Re Heidi Keefe Subpoena

Geoff,

This is the first we have heard about “forthcoming motions to compel” on document subpoenas - what are you referring to?

Best regards,

Lowell

Lowell Mead

Office 650 843 5734

Mobile 650 520 0788

On Jan 10, 2024, at 12:40 PM, Mason, Geoff
<gmason@sughrue.com> wrote:

[External]

<image004.png>

Dear Lowell,

We propose to move to have Judge Corley consider the motion to quash the subpoena of Ms. Keefe and the forthcoming motions to compel related document subpoenas given her familiarity with the related Box and Dropbox matters.

Please let us know if this is agreeable to your clients.

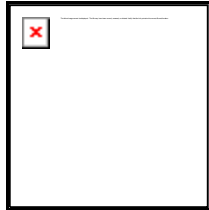
Sincerely,

Geoff

Geoff Mason

Sughrue Mion, PLLC | 2000 Pennsylvania Avenue, NW Suite
900 Washington, DC 20006 | Office: | Fax: 202-293-7860

gmason@sughrue.com - www.sughrue.com



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