

**From:** [Saukshmya Trichi](#)  
**To:** [Elliot Chen](#); [Viking\\_CCVL](#); [Derek Vandenburg](#); [Katherine Chen](#); [Iain A McIntyre](#)  
**Cc:** [Kelly Cunningham](#); [Edward Bustillos](#); [Tsteigen-v-Vikinglitgroup](#); [Selina Padilla](#)  
**Subject:** RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Request for Extension of Due Date 1  
**Date:** Tuesday, October 03, 2023 10:16:50 AM

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Counsel,

As noted in our August 24 email, we will need to schedule and complete deposition(s) in a timely manner to give us sufficient time before December 26, 2023 (Due Date 2). While we are agreeable to Patent Owner's request for another two-week extension of Due Date 1, we expect that you will provide Prof. Enders' availability (and that of any other declarants) for deposition(s) on or before October 17, 2023 per your August 24 email. If you are not willing to do so, please let us know immediately.

Subject to the parties' agreement to schedule these deposition(s), we do not believe an extension of Due Date 2 is necessitated at this time.

Regards,  
Saukshmya



**Saukshmya Trichi**  
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**From:** Elliot Chen <[echen@ecjlaw.com](mailto:echen@ecjlaw.com)>  
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**Subject:** Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Request for Extension of Due Date 1

Counsel,

We are writing to request a two-week extension of Due Date 1 for Patent Owner's Response to the Petition and/or Motion to Amend. We have recently learned that the current October 17 deadline conflicts with Professor Enders' professorial calendar and pre-existing commitments. We would, of course, be willing to grant Petitioner a corresponding extension of Due Date 2. Thank you in advance for your professional courtesy.

Best,  
Elliot

**Elliot Chen**

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