From:	Elliot Chen
To:	Saukshmya Trichi
Cc:	Derek Vandenburgh; Katherine Chen; Kelly Cunningham; Iain A McIntyre; Tsteigen-v-Vikinglitgroup; Aaron McGushion; Viking_CCVL; Mitch Williams
Subject:	RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474
Date:	Wednesday, August 23, 2023 5:27:28 PM

Saukshmya,

Understood regarding Dr. Schmidt's availability. We are available to take Dr. Schmidt's deposition on September 26, 2023, if Viking is willing to agree to a 14-day extension of the deadlines mentioned in my email, and consequent extension for Petitioner's Reply.

Please prepare a stipulation to extend due dates 1, 5, and 6, and the portion of due dates 2 and 3 related to Petitioner's Reply and Patent Owner's Sur-Reply, by 14 days.

Thank you,
Elliot

Elliot Chen
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From: Saukshmya Trichi <STrichi@carlsoncaspers.com>
Sent: Wednesday, August 23, 2023 1:45 PM
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Cc: Derek Vandenburgh <DVandenburgh@carlsoncaspers.com>; Katherine Chen <KChen@carlsoncaspers.com>; Kelly Cunningham <kcunningham@ecjlaw.com>; Iain A McIntyre <IMcIntyre@carlsoncaspers.com>; Tsteigen-v-Vikinglitgroup <Tsteigen-v-Vikinglitgroup@ecjlaw.com>; Aaron McGushion <aaron@mcgushion.com>; Viking_CCVL <Viking_CCVL@carlsoncaspers.com>; Mitch Williams <mwilliams@carlsoncaspers.com>
Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474

I note a correction as to your August 17, 2023 request.

Regards,
Saukshmya

Saukshmya Trichi

Carlson Caspers
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From: Saukshmya Trichi <STrichi@carlsoncaspers.com>
Sent: Wednesday, August 23, 2023 3:43 PM
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Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474

Elliot,

As noted in my email, Dr. Schmid has academic commitments, and you will also appreciate that it is beginning of the academic year. Specifically, Dr. Schmid has to teach Mondays and Wednesdays each week from 5:30 to 6:45 p.m. Eastern, and has professional commitments that were in place prior to your August 21, 2023 request. Further, we are also not available in the week of September 5, 2023. He remains available on September 26, 2023.

In the interest of accommodating Patent Owner's request, we are amenable to seeking a 10-day extension of the two deadlines mentioned in your email, and a consequent extension for Petitioner's response which is currently due on December 26, 2023.

Regards,
Saukshmya

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From: Elliot Chen <echen@ecjlaw.com>
Sent: Wednesday, August 23, 2023 12:22 PM
To: Saukshmya Trichi <STrichi@carlsoncaspers.com>
Cc: Derek Vandenburgh <DVandenburgh@carlsoncaspers.com>; Katherine Chen <KChen@carlsoncaspers.com>; Kelly Cunningham <kcunningham@ecjlaw.com>; Iain A McIntyre <IMcIntyre@carlsoncaspers.com>; Tsteigen-v-Vikinglitgroup <Tsteigen-v-

Vikinglitgroup@ecjlaw.com>; Aaron McGushion <aaron@mcgushion.com>; Viking_CCVL <Viking_CCVL@carlsoncaspers.com>; Mitch Williams <mwilliams@carlsoncaspers.com>
Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474

Saukshmya,

We requested Dr. Schmidt's availability during the first two weeks of September. As you know, under the current briefing schedule, Patent Owner's response to the petition or motion to amend is due on **October 3**. In fact, if Patent Owner decides to file a Motion to Amend, we must request a conference call with the Board by **September 19, 2023**. Scheduling Order at A.6. Because Dr. Schmidt's deposition could impact Patent Owner's decision in either regard, a September 26 deposition date does not work.

Please provide Dr. Schmidt's availability during the weeks of September 5 or September 12. Furthermore, while we believe that Dr. Schmidt's deposition pertaining to the issues raised in IPR2023-00473 and IPR2023-00474 can be completed in one day, we reserve the right to take Dr. Schmidt's deposition for a second day, should it be necessary.

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From: Saukshmya Trichi <STrichi@carlsoncaspers.com>
Sent: Wednesday, August 23, 2023 9:07 AM
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Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474

Counsel,

We write regarding Dr. Schmid's availability for a deposition in the above-captioned matters. Due to certain academic commitments, Dr. Schmid is available for a remote deposition on September 26, 2023. Please confirm if this date works for you. Petitioner is agreeable to your request that Dr.

Schmid be deposed once in IPR2023-00473 and IPR2023-00474.

Further, we are reviewing your requests on the discovery-related issues and will endeavor to provide our response soon.

Regards,
Saukshmya