

From: [Saukshmya Trichi](#)
To: [Kelly Cunningham](#); [Aaron McGushion](#)
Cc: [Derek Vandenburg](#); [Katherine Chen](#); [Iain A McIntyre](#); [Tsteigen-v-Vikinglitgroup](#); [Viking_CCVL](#); [Mitch Williams](#); [Elliot Chen](#)
Subject: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Patent Owner's Responses
Date: Wednesday, November 01, 2023 12:09:23 PM

Counsel,

We write regarding Patent Owner's Response, exhibits thereto and Patent Owner's Motion to Seal in IPR2023-00473 and IPR2023-00474 (collectively, "Patent Owner's responses"), which were filed through PTACTS beginning around 12:03 a.m. (Eastern Time), November 1, 2023.

Petitioner, Viking Drill & Tool, Inc. ("Petitioner") objects to Patent Owner's responses for failing to comply the Board's service requirements under 37 CFR § 42.6(e). Specifically, lead counsel for Patent Owner filed certificates of service that the Patent Owner's responses "ha[ve] been served in [] entirety this 31st day of October, 2023, by electronic mail on Petitioner's lead counsel," but no such service emails have been received by Petitioner's lead counsel. To the extent lead counsel for Patent Owner has served Patent Owner's responses via electronic mail on October 31, 2023, please provide proof of the same.

Either way, please provide copies of Patent Owner's responses immediately. We also request that all counsel of record for the Petitioner be included in future communications and service emails per 37 CFR § 42.6(e)(3).

Regards,
Saukshmya



Saukshmya Trichi
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From: [Saukshmya Trichi](#)
To: [Kelly Cunningham](#); [Tsteigen-v-Vikinglitgroup](#)
Cc: [Derek Vandenburg](#); [Katherine Chen](#); [Iain A McIntyre](#); [Viking_CCVL](#); [Mitch Williams](#); [Elliot Chen](#); [Aaron McGushion](#); [Sarah Jupina](#)
Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Patent Owner's Responses
Date: Friday, November 03, 2023 12:36:57 PM
Attachments: [image.png](#)

Counsel,

We write regarding Patent Owner, Hongjia Wang's improper service of Patent Owner's Exhibits filed on November 1, 2023 in IPR2023-00473 and IPR2023-00474.

Specifically, the link below for IPR2023-00474 contains incorrect PO Exhibits 2034 (Declaration of Prof. Endres) and 2035 (Declaration of Mr. Wang). First, the cover pages of PO Exhibits 2034 and 2035 (in the IPR2023-00474 folder link below) list the matter as IPR2023-00473. Second, while the Bates stamp in subsequent pages of PO Exhibits 2034 and 2035 identify both IPRs, the exhibits themselves are incomplete. For example, Patent Owner's Response in IPR2023-00474 cites to paragraphs from Exhibit 2034 that are missing in Exhibit 2034. *Compare, e.g.,* Patent Owner's Response (IPR2023-00474) at p. 13 (citing "Ex. 2034 ¶92") *with*, Exhibit 2034 (IPR2023-00474) at pp. 15-16 (no paragraph 92). In fact, Exhibit 2034 in both in IPR2023-00473 and IPR2023-00474 are completely missing paragraphs 52 through 120.

Petitioner, Viking Drill & Tool, Inc. objects to Patent Owner's improper service of inaccurate and incomplete exhibits. Please re-serve complete and accurate papers and exhibits in IPR2023-00473 and IPR2023-00474 by 5 p.m. (Central) today.

We also request redacted copies of at least Patent Owner's responses and Exhibits 2034, 2035 and 2036, to the extent that they contain Mr. Wang and/or Tsteigen's Confidential – Attorneys' Eyes Only information also by 5 p.m. (Central) today, so that we may provide these to our client and expert(s).

Viking's review is ongoing, and reserves all rights with respect to its objections to Patent Owner's submissions in IPR2023-00473 and IPR2023-00474.

Please acknowledge receipt of this email.

Regards,
Saukshmya



Saukshmya Trichi
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From: Sarah Jupina <sjupina@ecjlaw.com>

Sent: Wednesday, November 01, 2023 12:32 PM

To: Saukshmya Trichi <STrichi@carlsoncaspers.com>

Cc: Derek Vandenburg <DVandenburg@carlsoncaspers.com>; Katherine Chen <KChen@carlsoncaspers.com>; Iain A McIntyre <IMcIntyre@carlsoncaspers.com>; Tsteigen-v-Vikinglitgroup <Tsteigen-v-Vikinglitgroup@ecjlaw.com>; Viking_CCVL <Viking_CCVL@carlsoncaspers.com>; Mitch Williams <mwilliams@carlsoncaspers.com>; Elliot Chen <echen@ecjlaw.com>; Kelly Cunningham <kcunningham@ecjlaw.com>; Aaron McGushion <aaron@mcgushion.com>

Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Patent Owner's Responses

Dear Counsel,

Additionally, here are links including the Motion to Seal, Exhibit List and Exhibits filed in each IPR. Please let us know if you have any issues with these links.

 [IPR 2023-00473 Patent Owner's Response](#)

 [IPR 2023-00474 Patent Owner's Response](#)

Best,
Sarah

Sarah Jupina

Paralegal

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From: Sarah Jupina <sjupina@ecjlaw.com>

Sent: Wednesday, November 1, 2023 10:24 AM

To: Saukshmya Trichi <STrichi@carlsoncaspers.com>

Cc: Derek Vandenburg <DVandenburg@carlsoncaspers.com>; Katherine Chen <KChen@carlsoncaspers.com>; Iain A McIntyre <IMcIntyre@carlsoncaspers.com>; Tsteigen-v-Vikinglitgroup <Tsteigen-v-Vikinglitgroup@ecjlaw.com>; Viking_CCVL <Viking_CCVL@carlsoncaspers.com>; Mitch Williams <mwilliams@carlsoncaspers.com>; Elliot Chen <echen@ecjlaw.com>; Kelly Cunningham <kcunningham@ecjlaw.com>; Aaron McGushion

<aaron@mcgushion.com>

Subject: RE: Viking Drill & Tool v. Wang - IPR2023-00473 and IPR2023-00474 - Patent Owner's Responses

Dear Counsel,

Attached please find our Responses to Viking's Petition.

Best,
Sarah

Sarah Jupina

Paralegal

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From: Saukshmya Trichi <STrichi@carlsoncaspers.com>

Sent: Wednesday, November 1, 2023 10:09 AM

To: Kelly Cunningham <kcunningham@ecjlaw.com>; Aaron McGushion <aaron@mcgushion.com>

Cc: Derek Vandenburg <DVandenburg@carlsoncaspers.com>; Katherine Chen <KChen@carlsoncaspers.com>; Iain A McIntyre <IMcIntyre@carlsoncaspers.com>; Tsteigen-v-Vikinglitgroup <Tsteigen-v-Vikinglitgroup@ecjlaw.com>; Viking_CCVL <Viking_CCVL@carlsoncaspers.com>; Mitch Williams <mwilliams@carlsoncaspers.com>; Elliot Chen <echen@ecjlaw.com>

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Regards,
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