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Subject: Proposed Consolidation of IPR2023-00515 and IPR2023-00169

Dear Honorable Board:

I am lead counsel in IPR2023-00515, challenging the validity of US Patent No. 7,330,431. Further to the Board's Order dated August 4, 2023, Petitioner Arista has met and conferred with counsel for Corrigent, the patent owner, and counsel for Dell and Cisco, the petitioners in IPR2023-00169, to discuss an order consolidating the proceeding IPR2023-00515 with IPR2023-00169 under 35 U.S.C. 315(d) and 37 C.F.R. 42.122(a), including any proposals to modify the schedule in IPR2023-00169, in light of the consolidation.

The parties jointly propose the following regarding such consolidation: IPR2023-00515 (Arista's IPR proceeding) will be consolidated into IPR2023-00169 (the Cisco and Dell IPR proceeding). Arista's petition and exhibits 1020-1034 will be filed in IPR2023-00169 and the grounds of unpatentability in IPR2023-00515 will be incorporated into IPR2023-00169 as Ground 5 through Ground 8. Counsel for Dell, Cisco and Arista will be a joint petitioners' group, that will submit joint filings. Counsel for Dell and Cisco will lead the joint petitioners' group. Patent Owner has stipulated that it will not be filing a motion to amend.

The parties propose the following amendments to the schedule for IPR2023-00169:

Filing	Current Due Date	Proposed Due Date
Patent Owner Response	September 28, 2023	October 19, 2023
Petitioner's Reply	December 21, 2023	January 25, 2024
Patent Owner's Sur-Reply	February 1, 2024	March 7, 2024
Request for oral argument	February 22, 2024	March 14, 2024

The parties propose the following increases in the wordcount limit for the parties' main papers. Patent Owner Response will be increased from 14,000 to 18,000 words. The word limit for Petitioners' Reply will be increased from 5,600 to 7,200 words. The word limit for Patent Owner's Sur-Reply will be increased from 5,600 to 7,200 words.

The parties can be available for a teleconference with the Board, if necessary, to discuss this proposal.

Respectfully Submitted,

Eliot D. Williams

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