

From: [Cupar, David B.](#)
To: [Gokalp Bayramoglu](#)
Cc: [Shawn Mangano](#); [Nazly Bayramoglu](#); [Lucas Stelling](#); [Deniz Bayramoglu](#); [Cavanagh, Matthew J.](#); [Meeks, Susan](#); [Kurk, Nicholas](#); [Micalizzi, Julie](#)
Subject: Re: Chongqing Yanmei Technology v. Terves IPR2023-00521
Date: Wednesday, January 3, 2024 6:11:58 PM
Attachments: [image003.png](#)
[Outlook-tnobgdwi.png](#)

Counsel,

Patent Owner withdraws the Sherman Declaration and will not rely upon it in this IP proceeding. That declaration has no relevance to the grounds Petitioner raised. Therefore, Mr. Sherman's deposition is not necessary and Petitioner is not entitled to it.

David B. Cupar

On Jan 3, 2024, at 6:01 PM, Gokalp Bayramoglu <gokalp@bayramoglu-legal.com> wrote:

Counsel,

37 CFR Section 42.51 (b)(1)(ii) states that Cross Examination of affidavit testimony prepared for the proceeding is authorized within such period as the board may set. Sherman Declaration was submitted in the proceedings and relied on by the Patent Owner and we are within petitioner's discovery period. Accordingly, our client is entitled to the requested examination.

Please let me know a convenient location for Mr. Sherman so that we can send you the notice of deposition for cross examination.

Thank you.

<[Outlook-tnobgdwj.png](#)>

From: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Sent: Wednesday, January 3, 2024 6:34 AM
To: Gokalp Bayramoglu <gokalp@bayramoglu-legal.com>
Cc: Shawn Mangano <Shawnmangano@bayramoglu-legal.com>; Nazly Bayramoglu <nazly@bayramoglu-legal.com>; Lucas Stelling <lucas@bayramoglu-legal.com>; Deniz Bayramoglu <deniz@bayramoglu-legal.com>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>; Meeks, Susan <smeeks@mcdonaldhopkins.com>; Kurk, Nicholas <nkurk@mcdonaldhopkins.com>; Micalizzi, Julie <jmicalizzi@mcdonaldhopkins.com>
Subject: RE: Chongqing Yanmei Technology v. Terves IPR2023-00521

Counsel,

I'd like to better understand from you Chongqing's need for taking the Sherman Declaration. Patent Owner merely cited paragraphs 1-2 and 4 of the Sherman Declaration in two sentences the Background Section on pages 2 and 4 in its November 22, 2023 Response to the IPR Petition. Patent Owner did not cite to the Sherman Declaration as evidence regarding any substantive Grounds Petitioner raises.

Thanks,
David Cupar

David B. Cupar
Member

T: 216.430.2036
F: 216.348.5474
dcupar@mcdonaldhopkins.com
www.mcdonaldhopkins.com
[<image002.jpg>](#)

600 Superior Avenue East
Suite 2100
Cleveland, OH 44114

From: Gokalp Bayramoglu <gokalp@bayramoglu-legal.com>
Sent: Wednesday, January 3, 2024 9:03 AM
To: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Cc: Shawn Mangano <Shawnmangano@bayramoglu-legal.com>; Nazly Bayramoglu <nazly@bayramoglu-legal.com>; Lucas Stelling <lucas@bayramoglu-legal.com>; Deniz Bayramoglu <deniz@bayramoglu-legal.com>
Subject: [External] Re: Chongqing Yanmei Technology v. Terves IPR2023-00521

Counsel,

I sent you an email on December 28, 2023, stating the following:

" We would like to take deposition of Andrew J. Sherman. Before we send out the formal deposition notice, I would like to check with you to find out where Mr. Sherman lives and which city would be a good location for his deposition.

As far as timing goes, we were looking at the week of January 15, 2024 but can be flexible depending on your and Mr. Sherman's availability.

Please get back to me by Friday (12/29) so that we can notice the deposition in a timely manner."

Please get back to me on this request as soon as possible so that we can send you a deposition notice with a proper location for his deposition.

Thank you.

<image003.png>

From: Gokalp Bayramoglu <gokalp@bayramoglu-legal.com>
Sent: Thursday, December 28, 2023 7:23 AM
To: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Cc: Shawn Mangano <Shawnmangano@bayramoglu-legal.com>; Nazly Bayramoglu <nazly@bayramoglu-legal.com>; Lucas Stelling <lucas@bayramoglu-legal.com>; Deniz Bayramoglu <deniz@bayramoglu-legal.com>
Subject: Re: Chongqing Yanmei Technology v. Terves IPR2023-00521

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As far as timing goes, we were looking at the week of January 15, 2024 but can be flexible depending on your and Mr. Sherman's availability.

Please get back to me by Friday (12/29) so that we can notice the deposition in a timely manner.

Thank you for your cooperation.

<image003.png>

From: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Sent: Wednesday, November 22, 2023 8:29 AM
To: IN <in@bayramoglu-legal.com>; Gokalp Bayramoglu <gokalp@bayramoglu-legal.com>; Deniz Bayramoglu <deniz@bayramoglu-legal.com>
Subject: Chongqing Yanmei Technology v. Terves IPR2023-00521

Counsel,

Attached is a copy of Patent Owner's Response to Petition.

Dave

David B. Cupar
Member

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[<image004.jpg>](#)

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