

Naveed Hasan

From: Jaime Cardenas-Navia
Sent: Thursday, July 20, 2023 3:24 PM
To: Pickens, Robert S.; Mateo Fowler; Winn, James; Charles Bullock; Starz VL; RJ_VideoLabs-Starz; pedi@rlf.com; farnan@rlf.com; 'bfarnan@farnanlaw.com'; mfarnan@farnanlaw.com; Bahrad Sokhansanj
Subject: RE: Starz v. VideoLabs, C.A. No. 21-1448-JLH

Counsel,

Your assertion that claims 1 and 8 of the '790 patent remaining in the case is imposing an unjustified burden on Starz is completing baseless. These claims are still in effect, and other asserted claims of the '790 patent that have not been amended encompass largely the same subject matter (among other things) as claims 1 and 8. *See, e.g.,* '790 patent, claims 2, 9.

Regardless, VideoLabs will not be moving forward in this case with claims 1 and 8 of the '790 patent in their current state. We can handle the formalities when the amended versions of claims 1 and 8 are issued.

Best,
Jaime

Jaime F. Cardenas-Navia
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP
400 Madison Avenue, Suite 14D
New York, NY 10017
(646) 921-1474

From: Pickens, Robert S. <RSPickens@Venable.com>
Sent: Friday, July 14, 2023 5:25 PM
To: Mateo Fowler <mateofowler@mzflaw.com>; Winn, James <JWinn@Venable.com>; Charles Bullock <cbullock@reichmanjorgensen.com>; Starz VL <Starz_VL@Venable.com>; RJ_VideoLabs-Starz <RJ_VideoLabs-Starz@reichmanjorgensen.com>; pedi@rlf.com; farnan@rlf.com; 'bfarnan@farnanlaw.com' <bfarnan@farnanlaw.com>; mfarnan@farnanlaw.com
Subject: Starz v. VideoLabs, C.A. No. 21-1448-JLH

[EXTERNAL]

VideoLabs Counsel,

Please confirm by Monday that VideoLabs is dropping claims 1 and 8 of the '790 patent from this litigation based on the proceedings and developments in IPR2023-00628 and the 90/015,063 reexamination proceeding, including VideoLabs' statements that "Independent Claims 1 and 8 Were Amended and Entered, Effectively Extinguishing Their Pre-Amendment Forms," and that VideoLabs expects a Reexamination Certificate "will issue shortly."

VideoLabs' maintenance of these claims in its subsequent amended infringement contentions is without basis and purports to impose an unjustified burden on Starz to respond with regard to claims that have been "extinguish[ed]."

Regards,

Please note our new street address effective March 27, 2023. All other information is the same.

Robert S. Pickens, Esq. | Venable LLP

t 212.218.2333 | **f** 212.307.5598

151 W. 42nd Street, 49th Floor, New York, NY 10036

RSPickens@Venable.com | www.Venable.com

This electronic mail transmission may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.
