Subject: RE: Nokia IPR2023-00960 Scheduling
Date: Wednesday, March 27, 2024 at 1:29:06 PM Central Daylight Time
From: Riolo, Mary
To: ptong@raklaw.com, Stevens, Scott, Welch, Matt, O'Connor, Dan
CC: RAK_NextGen@raklaw.com, Wroblewski, Karlee
Attachments: IPR2023-00960 Preference Statement.docx

Thank you, Peter. The statement looks fine to us, and I've added Petitioner's signature block in the attached version.

Nokia's one concern with the below schedule is that PO's sur-reply is due November 19, which backs up to the date demonstratives are due for oral hearing, November 21. To remedy this, we propose moving all the deadlines up a week:

PO Response – July 11
Petitioner Reply – October 11
PO Sur-Reply – November 12

Please let me know if NextGen is amenable to this change.

Best,

Mary I. Riolo
Associate
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704-444-1284 (O)
mary.riolo@alston.com

From: ptong@raklaw.com <ptong@raklaw.com>
Sent: Tuesday, March 26, 2024 19:12
To: Riolo, Mary <Mary.Riolo@alston.com>; Stevens, Scott <Scott.Stevens@alston.com>; Welch, Matt <Matt.Welch@alston.com>; O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com; Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Subject: Re: Nokia IPR2023-00960 Scheduling

EXTERNAL SENDER – Proceed with caution

Hi Mary,

Attached is a draft joint statement of the Parties' preferred locations for argument, due tomorrow. Please track any changes you feel appropriate and provide Petitioner's signature block.

Given that Nokia has received a settlement offer and that the parties are making progress, please let us know if the proposed schedule below is agreeable. If so, I will draft up a proposed stipulation.

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From: Riolo, Mary <Mary.Riolo@alston.com>
Date: Wednesday, March 20, 2024 at 1:23 PM
To: ptong@raklaw.com <ptong@raklaw.com>, Stevens, Scott <Scott.Stevens@alston.com>, Welch, Matt <Matt.Welch@alston.com>, O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com <RAK_NextGen@raklaw.com>, Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Subject: RE: Nokia IPR2023-00960 Scheduling

Peter – thanks for providing the below schedule.

Our goal of consolidation with NextGen 2 was to allow for time to further settlement discussions between the parties, and this has largely stalled since January. We need to see an updated settlement offer from NextGen to ensure settlement discussions are moving forward.

As discussed on the call, we are open to pushing back the briefing schedule in a good faith effort to accommodate NextGen's upcoming deadlines. In light of this, however, please confirm NextGen will provide an updated offer in short order.

Best,

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From: ptong@raklaw.com <ptong@raklaw.com>
Sent: Monday, March 18, 2024 15:47
To: Riolo, Mary <Mary.Riolo@alston.com>; Stevens, Scott <Scott.Stevens@alston.com>; Welch, Matt <Matt.Welch@alston.com>; O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com; Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Subject: Re: Nokia IPR2023-00960 Scheduling
Importance: High

EXTERNAL SENDER – Proceed with caution

Hi Mary,

As we discussed on the call, we will prepare a joint statement indicating our preference for oral argument at Alexandria.

Additionally, please let us know if Nokia is amenable to pushing back the POR, Petitioner Reply, and PO Sur-Reply dates as follows. This pushes back the PO Sur-Reply as late as possible. The Petitioner Reply is due one month before that, on October 18, 2024. The POR is due 3 months before that, on July 18, 2024. This will give the parties time to continue their discussions, and Nokia can defer scheduling Dr. Prucnal's deposition until June.

Otherwise, we will need Dr. Prucnal to be available in late March or early April at the latest, given that the NextGen trial is set for May 6.

Date	**Description**	**Label**	**Proposed New Date**
21-May-24	PO Response PO Motion to Amend	Date 1	POR --> July 18, 2024
13-Aug-24	Petitioner's Reply Petitioner's Opp. Motion to Amend	Date 2	Pet. Reply --> Oct. 18, 2024
24-Sep-24	PO Sur Reply PO Reply Motion to Amend	Date 3	PO Sur-Reply --> Nov. 19, 2024
15-Oct-24	Request for oral argument	Date 4	
5-Nov-24	Petitioner's Sur-Reply Mot to Amend Motion to Exclude Evidence	Date 5	
12-Nov-24	Opp. to Motion to Exclude; Request for Prehearing Conference	Date 6	
19-Nov-24	Reply to Opp. to Exclude;	**Date 7**	Last day for PO Sur-Reply
3-Dec-24	Oral argument (Alexandria, San Jose, or Video)	**Date 8**	

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From: ptong@raklaw.com <ptong@raklaw.com>

Date: Friday, March 15, 2024 at 4:55 PM
To: Riolo, Mary <Mary.Riolo@alston.com>, Stevens, Scott <Scott.Stevens@alston.com>, Welch, Matt <Matt.Welch@alston.com>, O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com <RAK_NextGen@raklaw.com>, Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Subject: Re: Nokia IPR2023-00960 Scheduling

Thanks, Mary. Let's do 2 pm ET on Monday. Can you circulate an invite?

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From: Riolo, Mary <Mary.Riolo@alston.com>
Date: Friday, March 15, 2024 at 4:53 PM
To: ptong@raklaw.com <ptong@raklaw.com>, Stevens, Scott <Scott.Stevens@alston.com>, Welch, Matt <Matt.Welch@alston.com>, O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com <RAK_NextGen@raklaw.com>, Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Subject: RE: Nokia IPR2023-00960 Scheduling

Hi Peter,

We're available to discuss between 1pm-3pm ET Monday afternoon. Much of our team will be in Europe next week, so any later would be difficult for us.

Thanks,

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From: ptong@raklaw.com <ptong@raklaw.com>
Sent: Thursday, March 14, 2024 21:22
To: Stevens, Scott <Scott.Stevens@alston.com>; Welch, Matt <Matt.Welch@alston.com>; Riolo, Mary <Mary.Riolo@alston.com>; O'Connor, Dan <Dan.OConnor@alston.com>
Cc: RAK_NextGen@raklaw.com
Subject: Nokia IPR2023-00960 Scheduling

EXTERNAL SENDER – Proceed with caution

Hello counsel,

I propose we meet and confer next week on IPR scheduling. Our deadline for a joint statement regarding oral argument is due on March 27.

I further propose pushing back the schedule generally in view of the parties' ongoing discussions, and in view of the upcoming NextGen trial.

Please let me know your availability on Monday the 18th or Wednesday the 20th.

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