Anna Jackson

From: Michael Kiklis <michael@kiklisclark.com>
Sent: Monday, June 5, 2023 11:37 AM
To: Matt Holohan
Cc: kimani@kiklisclark.com; Rob Brunelli; Lori Brown; Joelle Enoch
Subject: Re: Google v. DDC, IPR2023-00707, -00708, -00709, -00710 & -00711

CAUTION: EXTERNAL EMAIL

Hi Matt,

We oppose DDC's request for leave to file a motion for additional discovery. We are available Wednesday from 12-3 Eastern and Friday from 12-5 Eastern for a call with the Board.

Best regards,

--Mike

Michael L. Kiklis
Kiklis and Clark, PLLC
1800 Diagonal Rd.
Suite 600, PMB 1093
Alexandria, VA 22314
Phone: 800-966-7832
Mobile: 202-262-5741
Email: Michael@kiklisclark.com
Website: kiklisclark.com

On Thu, Jun 1, 2023 at 1:02 PM Michael Kiklis <michael@kiklisclark.com> wrote:

> Hi Matt,
>
> I will confer with my client and get back to you.
>
> Best regards,
>
> --Mike
>
> Michael L. Kiklis
> Kiklis and Clark, PLLC
> 1800 Diagonal Rd.
> Suite 600, PMB 1093
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On Wed, May 31, 2023 at 4:21 PM Matt Holohan <mholohan@sheridanross.com> wrote:

Dear Counsel:

Pursuant to 37 C.F.R. 42.51(b)(2), Patent Owner DDC Technology, LLC ("DDC") will seek "Additional discovery" concerning matters related to the real parties in interest and privies in the above-referenced IPR proceedings. The proposed document requests are provided below. Please advise as to whether Petitioner agrees to the additional discovery and, if not, provide your availability for a telephone conference with the Board for DDC to seek leave to file a motion for additional discovery.

Best regards,

Matt Holohan

DEFINITIONS:

"Challenged Patents" means United States Patent Nos. 9,420,075, 9,811,184, 10,528,199, 11,093,000 and 11,093,001, which are subject to the IPR Petitions filed by Google on March 29, 2023 (IPR2023-00707, IPR2023-00708, IPR2023-00709, IPR2023-00710 and IPR2023-00711).

"DDC" means DDC Technology, LLC (current assignee of the Challenged Patents).

"DODOcase" means DODOcase VR, Inc. (former assignee of the Challenged Patents).

"Google" means Google LLC and any affiliate thereof.

"Mattel" means Mattel, Inc. and any affiliate thereof.

"Merchsource" means Merchsource LLC and any affiliate thereof.

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"UC" means Unofficial Cardboard, Inc. and any affiliate thereof.

"OPS" means Orora Packaging Solutions (fka Orora North America) and any affiliate thereof.

"WWGC Program" means the Works With Google Cardboard Program.

"Accused Products" means virtual reality ("VR") viewers with a capacitive/conductive touch component including, but not limited to, the Google Cardboard V2 VR Viewer, the Mattel View-Master VR Viewer, the Mattel View-Master Deluxe VR Viewer, the Merchsource Sharper Image Smartphone 360 VR Headset, the UC 2.0 VR Headset, and the UC 2.0+ VR Headset.

REQUESTS FOR PRODUCT OF DOCUMENTS AND THINGS

RFP No. 1: Documents constituting communications between Google and Mattel, Merchsource, UC, or OPS that concern or relate to DDC, the Challenged Patents, or DODOcase.

RFP No. 2: Documents constituting communications between Google and Mattel, Merchsource, UC, or OPS that concern or relate to any Accused Products.

RFP No. 3: Documents constituting communications between Google and Mattel, Merchsource, UC or OPS that concern or relate to demands or requests for indemnification regarding any product (including without limitation any VR-related product) or legal proceeding.

RFP No. 4: Documents constituting or discussing any contracts, agreements, or business arrangements between Google and Mattel, Merchsource, UC or OPS.

RFP No. 5: All documents related to the collaboration between Google and Mattel regarding the design, development, manufacture, use and/or sale of Mattel's Accused Products, which relationship appears to have commenced in or before February 2015 as referenced in the press release available at https://corporate.mattel.com/news/mattel-collaborates-with-google-to-reimagine-the-iconic-view-master-toy.

RFP No. 6: All documents related to involvement, membership or partnership in the WWGC Program by Mattel, Merchsource, UC, or OPS (including, but not limited to, any agreements entered into incident to involvement, membership or partnership in the WWGC Program).

RFP No. 7: All documents (including communications) related to Merchsource's prior IPR and PGR filings (IPR2018-00494, PGR2018-00019, and PGR2018-00020).

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Matthew C. Holohan

Shareholder

SHERIDAN ROSS PC / Attorneys at Innovation

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