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Subject: IPR2023-00726: Petitioner's Proposed Motions
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Attachments: [IPR2023-00726 Petitioners List of Proposed Motions.pdf](#)

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Your Honors,

Pursuant to section A(1) of the Board's Scheduling Order entered in IPR2023-00726 (Paper 11, Sept. 15, 2023), Petitioner requests an initial conference call with the Board to discuss proposed motions that may be filed in this case that are not authorized by the Order. We attach Petitioner's list of proposed motions for discussion with the Board. Petitioner has and continues to confer with Patent Owner regarding the same, but as of now have yet to reach a compromise on any of the motions except as identified below.

Additionally, as identified in the attached list, Petitioner hereby requests authorization from the Board pursuant to 37 CFR § 42.123 to file an unopposed motion to submit supplemental information in the same proceeding. More specifically, Petitioner requests authorization to file a motion to submit a supplemental declaration for librarian June Munford. Petitioner further requests authorization to supplement the declarations of translators David Sherman and Simon Liu, and to submit additional declarations from translators Amy Tinworth and Dr. Stephen Benyunes. Each of these declarations will provide further testimony supporting the public accessibility, and authenticity of prior art references relied upon in this case. For at least that reason, each declaration is relevant to a claim for which trial has been instituted.

Petitioner and Patent Owners have met and conferred regarding the foregoing request, and Patent Owners do not oppose the motion to supplement information. Should the Board wish to discuss this request, the parties are available to do so at the initial conference call when it is set by the Board.

Best regards,
David Conrad
Counsel for Petitioner

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