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Subject: IPR2023-00726 - Request for authorization to seek additional discovery - Depositions
Date: Friday, December 15, 2023 6:52:01 PM

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Your Honors,

I represent Patent Owners in IPR2023-00726.

I write to schedule a conference call to seek authorization to file a motion for additional discovery, namely the depositions of Yasmin Kaderali, Stephanie Medina, and Tisha Winters, all employees/executives of Petitioner. Some or all of these depositions will be a half-day or less.

Counsel for Patent Owners have met and conferred with counsel for Petitioner and have reached an impasse.

We request a conference call to seek authorization to file a motion for additional discovery. Counsel for petitioner and counsel for patent owner are available for a call at the following times:

-Tuesday 12/19: 9:00-11:30a.m; 3:30-5p.m. CT
-Wednesday 12/20: 9:00-11:30a.m., 1:30-2:30p.m.; 3:30-5:00p.m. CT
-Thursday 12/21: 9:00-11:00a.m.; 11:30a.m.-12p.m.; 1:00-2:30p.m. CT

Thank you.

Respectfully submitted,

Mark Ungerman
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EXHIBIT 3006

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Admitted to practice before the US Patent and Trademark Office and the Supreme Court of the United States. Admitted to the bar in the District of Columbia and California. Not admitted to the State Bar of Texas.

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