

From: [Carrano, Aliza George](#)
To: ["Naveed Hasan"; Mukerji, Indranil \(Indy\); Marshall, Steve; Netflix-VL_WFG](#)
Cc: [RJ_VideoLabs-Netflix](#)
Subject: RE: IPR2023-00891: Netflix, Inc. v. VL Collective, LLC - Meet and Confer
Date: Friday, February 9, 2024 6:04:04 PM

Naveed,

In an effort to reach a compromise, Netflix can agree to answer Interrogatory No. 1 and can either answer an interrogatory or provide a declaration establishing that Netflix has no control or direction over Unified Patents and has had no involvement with IPR2022-01086 that was filed by Unified Patents.

Please confirm whether this is acceptable to VideoLabs.

Regards,
Aliza

Aliza George Carrano
Willkie Farr & Gallagher LLP
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From: Naveed Hasan <nhasan@reichmanjorgensen.com>
Sent: Thursday, February 8, 2024 4:35 PM
To: Carrano, Aliza George <ACarrano@willkie.com>; Mukerji, Indranil (Indy) <IMukerji@willkie.com>; Marshall, Steve <SMarshall@willkie.com>; Netflix-VL_WFG <Netflix-VL_WFG@willkie.com>
Cc: RJ_VideoLabs-Netflix <RJ_VideoLabs-Netflix@reichmanjorgensen.com>
Subject: RE: IPR2023-00891: Netflix, Inc. v. VL Collective, LLC - Meet and Confer

*** **EXTERNAL EMAIL** ***

Aliza,

Please find attached a proposed list of compromise discovery requests. As explained on the call, this is not the full universe of discovery that Patent Owner is entitled to or might seek in a motion, but an effort to reach a compromise. Please let us know if Netflix is agreeable to any of the listed discovery requests.

Additionally, let us know if Netflix opposes Patent Owner from seeking discovery from Unified regarding Netflix's involvement in IPR2023-00891.

Please provide Netflix's position by close of business on **Friday February 9, 2024**.

Best Regards,
Naveed

Naveed S Hasan | **REICHMAN JORGENSEN LEHMAN & FELDBERG LLP** | Office: (202) 894-7305 |
Mobile: (703) 347-3000

From: Carrano, Aliza George <ACarrano@willkie.com>
Sent: Thursday, February 8, 2024 4:26 PM
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Cc: RJ_VideoLabs-Netflix <RJ_VideoLabs-Netflix@reichmanjorgensen.com>
Subject: RE: IPR2023-00891: Netflix, Inc. v. VL Collective, LLC - Meet and Confer

CAUTION: EXTERNAL SENDER

Counsel:

Following up on today's meet and confer, please send us VideoLabs' proposed discovery requests, so that we can fully evaluate them and determine whether any compromise can be made.

Regards,
Aliza

Aliza George Carrano
Willkie Farr & Gallagher LLP
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From: Naveed Hasan <nhasan@reichmanjorgensen.com>
Sent: Wednesday, February 7, 2024 8:46 PM
To: Carrano, Aliza George <ACarrano@willkie.com>; Mukerji, Indranil (Indy) <IMukerji@willkie.com>; Marshall, Steve <SMarshall@willkie.com>; Netflix-VL_WFG <Netflix-VL_WFG@willkie.com>
Cc: RJ_VideoLabs-Netflix <RJ_VideoLabs-Netflix@reichmanjorgensen.com>
Subject: RE: IPR2023-00891: Netflix, Inc. v. VL Collective, LLC - Meet and Confer

***** EXTERNAL EMAIL *****

Thank you, Aliza.

I will circulate an invite.

-Naveed

Naveed S Hasan | **REICHMAN JORGENSEN LEHMAN & FELDBERG LLP** | Office: (202) 894-7305 |
Mobile: (703) 347-3000

From: Carrano, Aliza George <ACarrano@willkie.com>
Sent: Wednesday, February 7, 2024 6:45 PM
To: Naveed Hasan <nhasan@reichmanjorgensen.com>; Mukerji, Indranil (Indy) <IMukerji@willkie.com>; Marshall, Steve <SMarshall@willkie.com>; Netflix-VL_WFG <Netflix-VL_WFG@willkie.com>
Cc: RJ_VideoLabs-Netflix <RJ_VideoLabs-Netflix@reichmanjorgensen.com>
Subject: Re: IPR2023-00891: Netflix, Inc. v. VL Collective, LLC - Meet and Confer

CAUTION: EXTERNAL SENDER

Naveed,

We are available at 2 pm ET.

Regards,
Aliza

—
On February 7, 2024 at 5:03:54 PM EST, Naveed Hasan <nhasan@reichmanjorgensen.com> wrote:

***** EXTERNAL EMAIL *****

Counsel,

Patent Owner is available for a meet-and-confer on February 8 before 3:00pm ET.

Please provide us with Petitioner's availability.

Best Regards,

Naveed S Hasan
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP
Office: (202) 894-7305
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Email: nhasan@reichmanjorgensen.com

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Aliza George Carrano

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