

From: [Trials](#)
To: [Naveed Hasan](#); [Trials](#)
Cc: [Carrano, Aliza George](#); [DSowers@willkie.com](#); [Mukerji, Indy](#); [Marshall, Steve](#); [netflix-vl_wfg@willkie.com](#); [RJ_VideoLabs-Netflix](#); [Christine E. Lehman](#); [Jaime Cardenas-Navia](#)
Subject: RE: IPR2023-00891: Netflix, Inc. v. VL Collective IP LLC
Date: Monday, February 10, 2025 7:46:28 AM

Counsel, the Board grants Patent Owner's unopposed request to file the emails listed below. The Board will file them as Exhibits 3005 and 3006. The Board also will file the instant email chain as Exhibit 3007.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Naveed Hasan <nhasan@reichmanjorgensen.com>
Sent: Friday, February 7, 2025 8:20 AM
To: Trials <Trials@USPTO.GOV>
Cc: Carrano, Aliza George <ACarrano@willkie.com>; DSowers@willkie.com; Mukerji, Indy <imukerji@cov.com>; Marshall, Steve <smarshall@cov.com>; netflix-vl_wfg@willkie.com; RJ_VideoLabs-Netflix <RJ_VideoLabs-Netflix@reichmanjorgensen.com>; Christine E. Lehman <clehman@reichmanjorgensen.com>; Jaime Cardenas-Navia <jcardenas-navia@reichmanjorgensen.com>
Subject: IPR2023-00891: Netflix, Inc. v. VL Collective IP LLC

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Dear Honorable Board:

Patent Owner requests that the Board enter certain correspondence between the Board and the parties as exhibits to the record in IPR2023-00891. Specifically, Patent Owner requests that the Board enter the following correspondence (see attached) as exhibits in the proceeding:

- Email from trials@uspto.gov (signed by Esther Goldschlager) on May 20, 2024 at 10:46 am ET, including chain of correspondence, with subject line "RE: IPR2023-00891 - Netflix, Inc. v. VL Collective, IP LLC"
- Email from trials@uspto.gov (signed by Esther Goldschlager) on June 24, 2024 at 8:20 am ET, including chain of correspondence, with subject line "RE: IPR2023-00891 - Netflix, Inc. v. VL Collective IP LLC - ('794 Patent)"

The Board has broad authority to grant this request. *See* 37 C.F.R. §§ 42.6(c), 42.5(a). The requested relief is warranted because it is in the interest of justice to allow for a more complete record on appeal. *See* 5 U.S.C. §706 (requiring judicial review to be based on “the whole record”); Fed. R. App. P. 16(a)(3) (defining the record on review of an agency order to include, among other things, “the pleadings, evidence, and other parts of the proceedings before the agency”). It is also in furtherance of the public availability goals of 37 C.F.R. § 42.14.

Counsel for all parties are copied on this email.

Petitioner does not object.

Best Regards,

Naveed S Hasan

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