

From: [Trials](#)
To: [Baker, W. Todd](#); [Trials](#)
Cc: [#Meta_VideoLabs](#); [Christine E. Lehman](#); [Michael Matulewicz-Crowley](#); [Jaime Cardenas-Navia](#); [Philip J. Eklem](#); [RJ_VideoLabs-Facebook](#)
Subject: RE: IPR2023-00924, Meta Platforms v. VL Collective IP
Date: Monday, January 8, 2024 4:05:30 PM

CAUTION: EXTERNAL SENDER

Counsel,
From the Board –
Because Patent Owner does not oppose authorization of a motion, no teleconference is necessary. Petitioner has one week from the date of this email to file a ten page motion for authorization to compel discovery and production of documents, to issue subpoenas, and to file testimony and documents produced therefrom. Patent Owner has one week from the date Petitioner files the motion to file a ten page opposition to the motion.

Regards,
Esther Goldschlager
Supervisory Paralegal Specialist
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Baker, W. Todd
Sent: Monday, January 8, 2024 11:46 AM
To: Trials
Cc: #Meta_VideoLabs ; clehman@reichmanjorgensen.com; mmatulewicz-crowley@reichmanjorgensen.com; jcardenas-navia@reichmanjorgensen.com; peklem@reichmanjorgensen.com; RJ_VideoLabs-Facebook@reichmanjorgensen.com
Subject: IPR2023-00924, Meta Platforms v. VL Collective IP

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Honorable Board,
Pursuant to paragraph A.1 of the Scheduling Order set forth in Paper 12 (IPR2023-00924) (“Order”), Petitioners request a conference call to discuss a proposed motion that has not been authorized by the Order. Specifically, Petitioners seek permission to file a Motion for Authorization to Compel Discovery and Production of Documents pursuant to 37 § C.F.R. § 42.52(a) to issue subpoenas pursuant to 35 U.S.C. § 24, as well as authorization to file any testimony or documents produced therefrom. Such Motion would be made to support the Petition and/or address the public availability issues outlined in the Decision Granting Institution (Paper 11), specifically with respect to Ground IV and the reference titled Tracking Loose-Limbed People (“TLP”) (EX1009 to the Petition). In particular, Petitioners expect that it might be necessary to compel discovery from assignees of the ’980 Patent, named inventors of the ’980 Patent, authors of TLP, and/or any related entities regarding the drafting, publication, and/or dissemination of TLP before May 27, 2004, the earliest claimed priority date of the ’980 Patent.

The Parties are available for a conference call, if required, anytime between 2:00 and 5:00 pm

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IPR2023-00924
Ex. 3006

ET on January 9 , 11 , or 12 .

The Parties have conferred and Patent Owner provided the following position:

Patent Owner does not oppose Petitioners' request to file the specified motion but opposes the discovery sought. Patent Owner therefore requests permission to file a brief of equal length in opposition.

Regards,

Todd Baker

Counsel for Petitioners

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