

From: [Garr, David](#)
To: [Trials](#)
Cc: [T61PTABDocket](#); [XW0PTABDocket](#); [RFMPATABDocket](#); [Hsu, Johannes](#); [Weidenfeller, Scott](#); [SDC-BOE-IPR](#)
Subject: RE: IPR2023-00941: PO request for additional discovery
Date: Thursday, February 22, 2024 7:37:30 PM

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Dear Honorable Board,

Patent Owner has advised Petitioner that it has withdrawn approximately 850 pages of deposition transcripts from its discovery request. The parties have conferred and agree that, after the narrowing, Patent Owner seeks 45 Mianyang BOE documents (45 ITC trial exhibits) that comprise approximately 5,423 pages.

Respectfully submitted,
David Garr
Counsel for Patent Owner

David A. Garr

Pronouns: He/Him/His

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Cc: T61PTABDocket <T61PTABDocket@orrick.com>; XW0PTABDocket <XW0PTABDocket@orrick.com>; RFMPATABDocket <RFMPATABDocket@orrick.com>; Hsu, Johannes <johanneshsu@orrick.com>; Weidenfeller, Scott <SWeidenfeller@cov.com>; SDC-BOE-IPR <SDC-BOE-IPR@cov.com>
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[EXTERNAL]

Counsel,

The Board would like more information regarding the narrowing of Patent Owner's request for additional discovery. After conferring with Petitioner, Patent Owner shall email the Board and indicate the approximate number of pages and number of ITC exhibits that are subject to the

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Ex. 3002

request after the narrowing.

Regards,

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

From: Garr, David <dgarr@cov.com>
Sent: Wednesday, February 21, 2024 12:31 PM
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Dear Honorable Board,

We write regarding Patent Owner Samsung Display's Motion for Additional Discovery in IPR2023-00941 (Paper 26). In the interest of narrowing the issues in dispute, Patent Owner has agreed to withdraw its request for deposition transcripts of Petitioner Mianyang BOE's witnesses (i.e., CX-1606C, CX-1607C, CX-1608C, CX-1620C, and CX-1622C) from parallel litigation before the U.S. International Trade Commission (Inv. No. 337-TA-1351).

Respectfully submitted,
David Garr
Counsel for Patent Owner

David A. Garr
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