Subject: RE: 754 IPR - PHV Admission
Date: Tuesday, June 25, 2024 at 3:09:12 PM Central Daylight Time
From: Wroblewski, Karlee
To: ptong@raklaw.com, rak_nextgen@raklaw.com
CC: Nokia22-309

Thank you, Peter.

Petitioner does not object to the submission or use of Dr. Prucnal's Opening Invalidity Expert Report for the '754 Patent, so long as Patent Owners submit and use the complete, unredacted report.

Do you intend to handle exhibits with prior printed paper copies, or will you be sharing them virtually throughout the deposition? Additionally, please provide us with reporter details when you have them, including when you intend to begin the deposition.

Thanks,
Karlee

Karlee N. Wroblewski
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From: ptong@raklaw.com <ptong@raklaw.com>
Sent: Tuesday, June 25, 2024 11:15 AM
To: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>; rak_nextgen@raklaw.com
Cc: Nokia22-309 <Nokia22-309@alston.com>
Subject: Re: 754 IPR - PHV Admission

EXTERNAL SENDER – Proceed with caution

We do not oppose her PHV admission. As a courtesy, we do not oppose her defending.

In the meantime, please let us know if Petitioner objects to the submission of Dr. Prucnal's Opening Invalidity Expert Report Regarding Invalidity of US Patent No. 8,238,754, from litigation, to the USPTO and/or use at deposition.

Based on the exhibit list at iii–v, It does not appear to be based on any confidential information of Nokia or the other Defendants. Only Exhibits SS and TT are NextGen's confidential information.

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Russ, August & Kabat
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From: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Date: Tuesday, June 25, 2024 at 9:07 AM
To: rak_nextgen@raklaw.com <rak_nextgen@raklaw.com>
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Subject: 754 IPR - PHV Admission

Counsel,

Petitioner intends to move the Board to admit Mary I. Riolo *pro hac vice* for purposes of this proceeding. Please let us know by end of day today, June 25th, if Patent Owners oppose.

In light of the forthcoming motion, please also let us know if Patent Owners oppose Ms. Riolo defending Dr. Prucnal's deposition this coming Saturday, June 29th.

Best,
Karlee

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