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To: [Deane, Michael](#)
Cc: [Xternal User - Sarah Spires](#); [Michael Valaik](#)
Subject: IPR Discovery
Date: Thursday, August 17, 2023 11:34:13 AM

Michael,

As you may know, I am serving as counsel for General Access in IPR No. 2023-00978, filed by Verizon (along with my colleagues copied here). In connection with that IPR, we would like to seek some limited discovery of T-Mobile related to the following issues: (1) whether Ericsson and/or Samsung were unidentified real parties in interest in IPR2017-01889 (the IPR filed by Sprint against the '931 patent), and (2) Ericsson, and/or Samsung's involvement in IPR2017-01889.

We'd specifically like to seek the following discovery:

1. Ericsson and/or Samsung's indemnification of Sprint in connection with IPR2017-01889.
2. Ericsson and/or Samsung's role in IPR2017-01889, including the extent to which Ericsson and/or Samsung assumed financial and/or operational responsibility for that IPR, or consulted with Sprint in connection with that IPR.
3. Any collaboration between Sprint and Verizon regarding their respective Petitions, either directly or through any mutual indemnitors or representatives.

Please let us know if T-Mobile is willing to voluntarily provide this discovery.

Best Regards,

-Nosson

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