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**Subject:** IPR2023-01061, IPR2023-01062 (CommScope v. Belden)

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Dear Board,

I represent Petitioner and respectfully request a conference call in the above-listed IPRs.

Petitioner requests a conference call to seek assistance in obtaining specific documents relevant to these IPR trials. Based on publicly available documents, Petitioner believes that Patent Owner took a position in a previous district court trial concerning the same patents is that inconsistent with positions Patent Owner is now taking. Specifically, it appears that Patent Owner previously took the position that the GmbH-866 reference disclosed twisted pairs; Patent Owner is now taking the opposite position.

Given this, Petitioner has requested production of non-publicly available documents from that district court trial that likely contain the inconsistent position: expert reports, testimony transcripts (e.g., depositions), and discovery responses (e.g., interrogatory and RFA responses regarding GmbH-866).

Petitioner believes Patent Owner is obligated to produce the documents without a motion as “routine discovery” pursuant to 37 CFR 42.51(b)(1)(iii). Patent Owner has declined, maintaining that it does not believe any documents take an inconsistent position. Petitioner also asked whether Patent Owner would oppose a motion to have the documents produced as additional discovery pursuant to 37 CFR 42.51(b)(2)(i), and Patent Owner stated it would oppose such a motion.

Petitioner therefore requests a conference call on the following two issues:

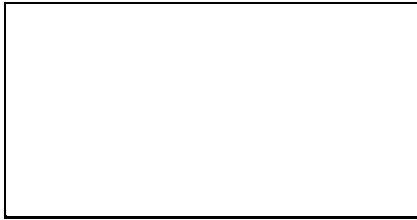
- (1) To seek Board assistance in having Patent Owner produce the documents as “routine” discovery, as Petitioner does not believe it should have to file a motion to obtain what the rules plainly require Patent Owner to provide sua sponte.
- (2) If necessary, to seek permission to file a motion requesting the documents as “additional discovery” that is in the interests of justice.

Petitioner has conferred with Patent Owner, and the parties are available for a call with the Board from 9 am to 12 noon Eastern Wednesday through Friday of this week (April 17-19).

Best regards,

Peter Kohlhepp

IPR2023-01061; IPR2023-01062  
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