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Subject:	Consolidation in Proceedings for US Patent No. 7,246,058 -- Sony (IPR2023-01119), LGE (IPR2023-01110), Meta(IPR2023-01352)
Date:	Thursday, February 8, 2024 5:00:43 PM

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Dear Board,

I represent Petitioner Sony Electronics Inc. ("Sony") in IPR2023-01119, challenging the validity of the claims of US Patent No. 7,246,058.

The Board did not include a consolidation request in the scheduling order for Sony's proceeding (IPR2023-01119) for the '058 patent but it did include a consolidation request in the scheduling order in LGE's proceeding (IPR2023- 01110) for the '058 patent requesting that the parties contact the Board by February 8 to discuss consolidation and coordination among the petitioners. That request also referenced Meta's pending IPR petition (IPR2023 -01352) along with Sony's and LGE's petitions challenging the validity of the claims of the '058 patent. The Board has not yet issued an institution decision on Meta's IPR petition (IPR2023-01352), which is based on different grounds and relies upon the declaration of a different expert (Dr. Anderson) than the expert declaration (Dr. Stern) submitted with Sony's and LGE's petitions.

The parties in the above-identified proceedings (Patent Owner Jawbone Innovations, LLC and Petitioners Sony Electronics Inc., LG Electronics Inc, and Meta Platforms, Inc.) have met and conferred about the consolidation and coordination of these proceedings and have agreed on the following proposal:

Sony's and LGE's IPR proceedings should be consolidated. Sony will take the lead role and LGE will take an understudy role. It is our understanding that LGE and Jawbone reached a settlement in-principle and are now working on a formal agreement. Thus, LGE will participate in the proceeding including any discussion about consolidation and coordination among the parties as it is still a petitioner, and a formal agreement has not yet been finalized, but LGE will assume an understudy role.

Sony's and Meta's proceedings should not be consolidated in view of the different grounds and different supporting expert declarations in those proceedings.

The parties are available for a conference call with the Board on February 13 at 11:00 AM ET, or another time convenient for the Board, if needed to discuss consolidation and coordination.

Please advise if the Board would like to discuss these proceeding and, if so, if the Board is available at any of the above times. If these times do not work for the Board, please propose alternate time availability.

Respectfully Submitted,

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