

From: [Bregman, Dion M.](#)
To: [Wolfe, Michael](#); [John McKee](#)
Cc: [MLB-Lam-IPR-Team](#); [Deepa Acharya](#); [PH-Lam-Inpria-IPR](#)
Subject: [EXT] RE: 561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) - 11/18/2024 - 10:30AM ET
Date: Friday, November 22, 2024 4:59:06 PM

--- External Email ---

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John and Michael,

Lam's motion for third party discovery, which was authorized by the Board, is still pending. If granted, we plan to promptly take a deposition of Ms. Stewart after the subpoenaed documents are produced. We believe that a single consolidated deposition would be more efficient and convenient for the witness, and encourage Inpria to bear this in mind in scheduling its separately noticed deposition.

Regards,

-Dion

Dion M. Bregman

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From: Wolfe, Michael <michaelwolfe@paulhastings.com>

Sent: Thursday, November 21, 2024 3:53 PM

To: John McKee <johnmckee@quinnemanuel.com>

Cc: Bregman, Dion M. <dion.bregman@morganlewis.com>; MLB-Lam-IPR-Team <MLB-Lam-IPR-Team@morganlewis.com>; Deepa Acharya <deepaacharya@quinnemanuel.com>; PH-Lam-Inpria-IPR <PH-Lam-Inpria-IPR@paulhastings.com>

Subject: RE: 561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) - 11/18/2024 - 10:30AM ET

[EXTERNAL EMAIL]

John,

Thank you for the call earlier today to ask whether we would be willing to wait until the Board acts on Lam's motion before any deposition. We understand from your call that you are concerned that there may now be two depositions because of Lam's motion.

We are unsure what communications have occurred between Lam and ProQuest, but from our perspective we believe a deposition of Ms. Stewart should occur at least a week before our current deadline of December 4, pursuant to the Board's rules.

Thanks,
Michael Wolfe

From: John McKee <johnmckee@quinnemanuel.com>
Sent: Friday, November 15, 2024 9:27 AM
To: Wolfe, Michael <michaelwolfe@paulhastings.com>; Bregman, Dion M. <dion.bregman@morganlewis.com>
Cc: MLB-Lam-IPR-Team <MLB-Lam-IPR-Team@morganlewis.com>; Deepa Acharya <deepaacharya@quinnemanuel.com>; PH-Lam-Inpria-IPR <PH-Lam-Inpria-IPR@paulhastings.com>
Subject: [EXT] RE: 561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) - 11/18/2024 - 10:30AM ET

As I explained in my email, Ms. Stewart is not available on the 18th. We will send an email rescheduling her deposition as soon as possible, and we are aware of your December 4 deadline.

From: Wolfe, Michael <michaelwolfe@paulhastings.com>
Sent: Friday, November 15, 2024 9:26 AM
To: Bregman, Dion M. <dion.bregman@morganlewis.com>; John McKee <johnmckee@quinnemanuel.com>
Cc: MLB-Lam-IPR-Team <MLB-Lam-IPR-Team@morganlewis.com>; Deepa Acharya <deepaacharya@quinnemanuel.com>; PH-Lam-Inpria-IPR <PH-Lam-Inpria-IPR@paulhastings.com>
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[EXTERNAL EMAIL from michaelwolfe@paulhastings.com]

John and Dion,

Please clarify whether Ms. Stewart now will be available on Monday, November 18 at 10:30am ET for the deposition. If not, please confirm as soon as possible when she will be available.

Thanks,
Michael Wolfe

From: Bregman, Dion M. <dion.bregman@morganlewis.com>
Sent: Thursday, November 14, 2024 1:24 PM
To: John McKee <johnmckee@quinnemanuel.com>
Cc: MLB-Lam-IPR-Team <MLB-Lam-IPR-Team@morganlewis.com>; Deepa Acharya <deepaacharya@quinnemanuel.com>; PH-Lam-Inpria-IPR <PH-Lam-Inpria-IPR@paulhastings.com>
Subject: [EXT] FW: 561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) -

11/18/2024 - 10:30AM ET

Forwarding along the zoom link.

Dion M. Bregman

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From: Planet Depos Tech Support <techsupport@planetdepos.com>

Sent: Thursday, November 14, 2024 5:30 AM

To: MLB-Lam-IPR-Team <MLB-Lam-IPR-Team@morganlewis.com>

Subject: 561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) - 11/18/2024 - 10:30AM ET

[EXTERNAL EMAIL]

Greetings from Planet Depos,

Below is the link you will need to connect to the video conference

ZOOM

561080 - Heather Stewart - LAM Research Corp. -v- Inpria Corp. (PTAB) - 11/18/2024 - 10:30AM ET

Meeting Link: <https://planetdepos.zoom.us/j/98471306617>

Meeting ID: 984 7130 6617

Passcode: 076694

Call in #: 301 715 8592

Meeting ID: 984 7130 6617

Passcode: 076694

Join by SIP

98471306617@zoomcrc.com

Join by VC Unit/H.323

[162.255.37.11](tel:162.255.37.11)

Meeting ID: 984 7130 6617

Passcode: 076694

Real Time Stream

Go to the website: CaseviewNet.com Under Login Information enter the following information: Session Code: C50ACB

Password: (561080) Name: (your name) Company: (your firm name) E-mail: (your e-mail address) Then click Connect.

Please let us know if you have any questions.

If you would like an in-depth look at how Planet Depos conducts remote depositions using Zoom, please [click here](#) to watch our Zoom training video.

Thank you,

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