From: "Modi, Naveen" <naveenmodi@paulhastings.com>
Subject: RE: Re: Samsung v. Broadphone IPRs2024-00153, 2024-00154 and 2024-00155 - Patent Owner's Preliminary Responses
Date: February 26, 2024 at 04:47:38 HST
To: "Christian W. Conkle" <cconkle@raklaw.com>
Cc: Alexandra Loew <aloew@raklaw.com>, Samsung-Broadphone-IPR <PH-Samsung-Broadphone-IPR@paulhastings.com>, "broadphone@raklaw.com" <broadphone@raklaw.com>, Reza Mirzaie <rmirzaie@raklaw.com>

Christian,

Samsung will take a position after it is able to review Broadphone's as-filed motion.

Many thanks,
Naveen

Naveen Modi
Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Christian W. Conkle <cconkle@raklaw.com>
Sent: Friday, February 23, 2024 3:14 PM
To: Modi, Naveen <naveenmodi@paulhastings.com>
Cc: Alexandra Loew <aloew@raklaw.com>; Samsung-Broadphone-IPR <PH-Samsung-Broadphone-IPR@paulhastings.com>; broadphone@raklaw.com; Reza Mirzaie <rmirzaie@raklaw.com>
Subject: [EXT] Re: Samsung v. Broadphone IPRs2024-00153, 2024-00154 and 2024-00155 - Patent Owner's Preliminary Responses

Naveen,

Following up on this. Please let us know your position today so that we can include it in our motion.

All best,

Christian W. Conkle
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025
310 826-7474

On Feb 21, 2024, at 16:51, Reza <rmirzaie@raklaw.com> wrote:

Hello Naveen,

As a quick follow-up to Christian's email, we intend to email the Board today, at 7 pm PST. Please let us know whether your client opposes the relief we seek before then and we will let the Board know. If so, please let us know what prejudice you believe your client has suffered. And if we do not hear from you by 7 pm, we will let the Board know that we've notified your side and are still waiting for a response (which is understandable given the timing of all this).

Thanks,
Reza

On Feb 21, 2024, at 3:03 PM, Christian W. Conkle <cconkle@raklaw.com> wrote:

Naveen,

Due to an internal miscommunication, our filing staff was unexpectedly unable to log into the new electronic filing system until this morning. Because we served you with copies of the briefs before the deadline, and because the briefs were filed less than twenty-four hours after the deadline, we believe that excusing the late filing would be supported by good cause and would be in the interests of justice.

We intend to email the Board requesting that the Board deem the POPRs timely filed or excused. Please indicate whether you oppose that request. To be clear, we have not communicated with the Board without copying you.

All best,

Christian W. Conkle
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025
310 826-7474

On Feb 21, 2024, at 13:12, Modi, Naveen <naveenmodi@paulhastings.com> wrote:

Counsel,

We noticed that Broadphone filed the POPRs today. From Samsung's perspective, these were filed late. We assume Broadphone will contact the Board regarding its late filings. Also, we ask again for more details regarding the technical difficulties you encountered. Please also provide us with details of all communications with the Board regarding the filings, including copies of all correspondence you have had with the Board on which Samsung was not copied.

Thanks,
Naveen

Naveen Modi
Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Modi, Naveen
Sent: Wednesday, February 21, 2024 12:48 PM
To: Alexandra Loew <aloew@raklaw.com>; Samsung-Broadphone-IPR <PH-Samsung-Broadphone-IPR@paulhastings.com>
Cc: broadphone@raklaw.com
Subject: RE: [EXT] Samsung v. Broadphone IPRs2024-00153, 2024-00154 and 2024-00155 - Patent Owner's Preliminary Responses

Counsel,

Thank you for your email. Can you please explain the technical difficulties you had? Please also include us on any communications with the Board on this issue.

Many thanks,
Naveen

Naveen Modi
Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Alexandra Loew <aloew@raklaw.com>
Sent: Tuesday, February 20, 2024 11:57 PM
To: Samsung-Broadphone-IPR <PH-Samsung-Broadphone-IPR@paulhastings.com>
Cc: broadphone@raklaw.com
Subject: [EXT] Samsung v. Broadphone IPRs2024-00153, 2024-00154 and 2024-00155 - Patent Owner's Preliminary Responses

Counsel

Please find attached Patent Owner's Preliminary Responses in the above-referenced cases. Please note that, due to technical difficulties with the online system, we will be filing these as soon as possible tomorrow morning.

****
This message is sent by a law firm and may contain information that is privileged or confidential. If you received
this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.
If you reply to this message, Paul Hastings may collect personal information including your name, business name
and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy
and security principles please click HERE. If you have any questions, please
contact Privacy@paulhastings.com.