

From: [Quincy Lu](#)
To: [Trials](#); [Playrix-IPRs](#); [Moore, Steve](#); [Lee, Josh](#); [Rinehart, Andy](#); [Koballa, Kasey](#); [Adkins, Robin](#); [Morlock, Michael](#)
Subject: RE: IPR2024-00132, -00171, -00200, -00209
Date: Wednesday, October 23, 2024 5:47:13 PM

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Your Honors,

The parties conferred prior to the filing of the motions and Patent Owner indicated it did not oppose. In an email from August 20, 2024, Patent Owner stated it “does not object to ... Ron Hagiz ... appearing pro hac vice.”

Regards,
Quincy

From: Trials <Trials@USPTO.GOV>
Sent: Wednesday, October 23, 2024 1:49 PM
To: Quincy Lu <quincylu@quinnemanuel.com>; Playrix-IPRs <playrix-iprs@quinnemanuel.com>; Moore, Steve <smoore@ktslaw.com>; Lee, Josh <JLee@ktslaw.com>; Rinehart, Andy <arinehart@ktslaw.com>; Koballa, Kasey <KKoballa@ktslaw.com>; Adkins, Robin <RAdkins@ktslaw.com>; Morlock, Michael <MMorlock@ktslaw.com>
Cc: Trials <Trials@USPTO.GOV>
Subject: RE: IPR2024-00132, -00171, -00200, -00209

[EXTERNAL EMAIL from trials@uspto.gov]

Counsel,

The Motions do not state that Patent Owner does not oppose Mr. Hagiz’s admission *pro hac vice*. The email below says that Petitioner asked Patent Owner its position on Mr. Hagiz’s participation in the deposition. Please confer with Patent Owner on its position on the Motions and report back whether the Motions are unopposed.

Regards,

Tina

From: Quincy Lu <quincylu@quinnemanuel.com>
Sent: Wednesday, October 23, 2024 3:16 PM
To: Trials <Trials@USPTO.GOV>
Cc: Playrix-IPRs <playrix-iprs@quinnemanuel.com>; Moore, Steve <smoore@ktslaw.com>; Lee, Josh <JLee@ktslaw.com>; Rinehart, Andy <arinehart@ktslaw.com>; Koballa, Kasey <KKoballa@ktslaw.com>; Adkins, Robin <RAdkins@ktslaw.com>; Morlock, Michael

Ex. 3001
IPR2024-00171
IPR2024-00200
IPR2024-00209

<MMorlock@ktslaw.com>

Subject: IPR2024-00132, -00171, -00200, -00209

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Your Honors,

I am counsel of record for Petitioner in the above-captioned matters. For all four proceedings, the parties have agreed to hold a deposition of Patent Owner's expert, Dr. Akl, starting tomorrow morning. For Petitioner, Mr. Ron Hagiz is planning to participate, although his unopposed motions to appear pro hac vice remain pending. Petitioner reached out to Patent Owner earlier today regarding whether they would oppose Mr. Hagiz's participation and are waiting for their position. However, given that the deposition is scheduled for tomorrow, Petitioner believed it prudent to send out this email now, and will update the Board on Patent Owner's position, if necessary.

Petitioner respectfully requests the Board's attention in this matter.

Respectfully submitted,
Quincy Lu

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