

Transcript

Case Number: IPR2024-00286 U.S. Patent No. 11,611,520

Date: March 28, 2025

In the matter of:

DROPBOX, INC v MOTION OFFENSE, LLC

CONFERENCE CALL

**CERTIFIED
COPY**

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EXHIBIT 2016

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5 DROPBOX, INC.

6 Petitioner

7 v.

8 MOTION OFFENSE, LLC,

9 Patent Owner

10
11 IPR 2024-00286

12 U.S. Patent No. 11,611,520

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18 The conference call with the PTAB Board
19 was held via teleconference on Friday, March 28,
20 2025, commencing at 1:58 p.m. Eastern time, before
21 Ahuva Goldberger, Notary Public.

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24
25 REPORTED BY: Ahuva Goldberger

1 APPEARANCES:

2
3 JUDGE NORMAN BEAMER, PTAB PANEL CHAIR

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2 THE COURT REPORTER: Hello, this is the
3 court reporter.

4 MR. LANTIER: Good afternoon. This is
5 Greg Lantier from Wilmer Hale on behalf of
6 Dropbox.

7 MR. DAHLGREN: And this is Derek
8 Dahlgren from Devlin Law Firm on behalf of Patent
9 Owner Motion Offense.

10 THE COURT: Sorry. Apparently I got
11 muted. I assume you heard me introduce the case
12 because both parties have made an appearance.
13 Okay. I was muted. Let me repeat what I said.

14 This is Judge Norman Beamer, and with me
15 on the line are Judges Roski [phonetic] and
16 Geonetti [phonetic]. This is IPR2024286 and 287.

17 I heard that the parties made their
18 appearances. So -- and my question was who is in
19 charge of -- going to take the responsibility of
20 filing the transcript?

21 MR. DAHLGREN: Your Honor, this is Derek
22 Dahlgren on behalf of Patent Owner. We requested
23 the call and have obtained the court reporter, so
24 we'll take responsibility for filing the
25 transcript.

1 THE COURT: I guess it would be
2 advisable to expedite that so we get it as soon as
3 possible.

4 So, Patent Owner, since you requested
5 the call, why don't you go first, and tell us what
6 you're interested in.

7 MR. DAHLGREN: Sure. Your Honor,
8 there's two issues that we would like to discuss.
9 The first is with respect to Exhibit 2026 and the
10 Houston provisional patent application.

11 We had requested authorization to
12 correct the exhibit. That was denied. And there
13 was an e-mail that was provided indicating that
14 prior notes have been given to Patent Owner. We
15 reviewed that e-mail, Your Honor, and I think that
16 there's good cause to still allow the correction
17 of the exhibit.

18 That e-mail was sent only to lead
19 counsel for Patent Owner. Patent Owner had
20 already filed its mandatory notices, including
21 identifying back-up counsel and contact
22 information for back-up counsel.

23 Lead counsel was unable to make the call
24 today, but he's willing to submit a declaration if
25 necessary, indicating that he thought that the

1 correspondence was also being provided to back-up
2 counsel.

3 He did not forward that e-mail to us.
4 He assumed that we were going to make that
5 correction. I did not learn about the mistake
6 with the exhibit until shortly before the
7 deposition of Dr. Mowry on March -- I believe it
8 was March 11th. And we had identified it during
9 deposition, this issue, to Petitioner. And I want
10 to know that I -- we believe there's good cause
11 because, you know, notification wasn't provided to
12 all of counsel for Patent Owner, and also because
13 the correct provisional application number was
14 identified in the table of exhibits. This is a
15 provisional -- one of two provisional applications
16 that's incorporated by reference. It's already,
17 we believe, part of the documents, that housing
18 reference itself, and that is the error not to
19 consider its disclosure, because, you know, we
20 would be looking at the prior reference as a
21 whole.

22 So we also don't think there's any
23 prejudice to Petitioner. Petitioner was copied on
24 that e-mail from the board. Both lead and back-up
25 counsel, unlike Patent Owner, they were aware of

1 this issue and just chose not to address it, or
2 address it in the manner that they did. So we
3 don't think there's any prejudice here.

4 So that's the first piece of the reason
5 I requested the call today with the board.

6 The second is --

7 THE COURT: Excuse me, counsel?

8 MR. DAHLGREN: Yes?

9 THE COURT: Where is lead counsel? Why
10 aren't they on the call?

11 MR. DAHLGREN: Lead counsel was
12 traveling, so he was unable to make the call. But
13 as I said, we can submit a declaration that
14 attests to what I just told you.

15 THE COURT: Okay. So let's hear the
16 second issue.

17 MR. DAHLGREN: The second issue is
18 during the course of preparing for Dr. Mowry's
19 deposition on March 11th, we indicated belief that
20 Petitioner had not disclosed some inconsistent
21 information with positions being taken in the
22 IPRs. We raised that issue. Doubled that
23 information didn't exist at the time that we
24 submitted our Patent Owner response, and in fact,
25 we've identified the information that didn't exist

1 at the time of Dr. Mowry's deposition,
2 specifically an expert report that was filed and
3 redacted form on March 17th after the deposition.

4 And we would request permission to file
5 a motion seeking leave to supplement the record
6 with this additional evidence and believe that,
7 you know, at least some of this evidence falls
8 squarely under 42.123, you know, for filing of
9 supplemental information.

10 And the reason I want to do this is we
11 want to make sure that there's a record of the
12 information that we believe should be included in
13 the record and considered by the board. We think
14 it's in, you know, the interest of justice to
15 consider the merits of, you know, these arguments
16 and to have that record available for any
17 appellate review, you know, particularly I -- you
18 appoint the board to the federal circuit's
19 Ultratech v. CaptionCall decision where there was
20 some evidentiary issues that were disposed of
21 during the underlying IPR proceeding, and The
22 Court noted that the record wasn't developed
23 enough for meaningful appellate review and vacated
24 and remanded.

25 And so here we just request

1 authorization to submit a motion identifying the
2 evidence that we think should be part of the
3 record, you know, why it should be part of the
4 record, and then the board issue whatever decision
5 it deems appropriate, but at least that way it's
6 memorializing the record.

7 THE COURT: What's the inconsistent
8 thing that you're referring to?

9 MR. DAHLGREN: Well, so, there's a few
10 different examples, but the expert report from
11 March 17th, it was a damages report, and it was
12 characterizing the early Dropbox system and what
13 Mr. Houston, who is the inventor on Exhibit 1003
14 and also the provisional application that's at
15 issue, and the fact that there was, you know, this
16 overarching concern about having locally available
17 copies of any, you know, shared folders or files
18 available on only user's devices, and that that is
19 taking away from the proposed combination that
20 Dropbox has identified in its petition.

21 THE COURT: Isn't that two, in other
22 words, the stuff that we've already looked at?

23 MR. DAHLGREN: Your Honor, I don't
24 believe that that is necessarily a basis for
25 disregarding the evidence. And when you have

1 Dropbox's own expert extolling on the importance
2 of having locally available copies, you know, I
3 think that that is something that should be fairly
4 considered in the record.

5 THE COURT: What -- you referred to an
6 expert report that was redacted. That was --
7 could you explain more details about what that is?
8 Was that filed in --

9 MR. DAHLGREN: Yes, Your Honor. It was
10 filed in a -- it's a case brought by Entangled
11 Media. I guess Dropbox is in the Northern
12 District of California. And there was a redacted
13 damages expert report that was included as an
14 exhibit on one of the filings on March 17th of
15 2025, and the expert discussed the early
16 development of Dropbox. And so we think that goes
17 again to the issue of the, you know, motivation to
18 combine, and the fair reading of Houston and,
19 again, the importance that it places on having
20 these locally available copies.

21 THE COURT: Is this Dr. Mowry you're
22 talking about?

23 MR. DAHLGREN: This is a different
24 expert. This is a damages expert, not a technical
25 expert. And there are other disclosures that we

1 believe are relevant. Some may or, you know, may
2 not be as late, you know, after Dr. Mowry's
3 deposition, but we would identify those and the
4 relevant timing and, you know, so the board can
5 consider whether or not, you know, there's good
6 cause and it's in the interest of justice to
7 consider that evidence as part of the merit
8 systems decision.

9 THE COURT: Harking back to the first --
10 turning to the first issue that you raised, I'm a
11 little bit curious as to why the lead counsel
12 couldn't have gotten on the phone, at least.

13 MR. DAHLGREN: I understand, Your Honor.
14 And, again, he's traveling and not available, but
15 he is willing to submit a declaration, you know, a
16 signed declaration, you know, attesting to
17 everything that I just -- I just said.

18 THE COURT: Okay. So anything more on
19 the second issue about who presently inconsistent
20 information?

21 MR. DAHLGREN: Yes, Your Honor. So I
22 just want to point out that because of the timing,
23 you know, we had identified this concern during
24 Dr. Mowry's deposition on March 11th. We weren't
25 able to confer with Dropbox until March 14th, that

1 was a Friday. We had provided, you know, numerous
2 examples of, you know, these -- what we've seen to
3 be inconsistencies and their failure to produce
4 the information as required under the patent
5 office's rules.

6 They, you know, didn't get back to us
7 until, you know, the following week. And so with
8 the timing, you know, we have identified in
9 passing some examples in our sur-replies, and
10 counsel for Dropbox had contacted us and indicated
11 that they believe that that was improper and
12 wanted to intend to move to strike. And so we
13 think that this is an important issue.

14 And again, we're requesting the briefing
15 just so that it's, you know, fully developed in
16 the record so that it can be, you know, part of,
17 you know, of any appeal, you know, if necessary.

18 So, again, I just wanted to emphasize
19 that we -- to just make sure that the record is
20 fully developed for these issues.

21 THE COURT: So just so I can nail down
22 my understanding of the timing, you filed as
23 Exhibit 2053 a deposition of Dr. Mowry taken
24 March 11th, and you're saying this information
25 came to your attention after that?

1 MR. DAHLGREN: So, Your Honor, it became
2 -- so we became aware of some information the day
3 before Dr. Mowry's deposition, and then
4 afterwards, when we had the discussion with
5 Dropbox, they asked us to identify examples, and
6 so we've spent significant amount of time going
7 through, you know, the prosecution history for
8 Dropbox applications, looking for character -- you
9 know, how they characterize some of the references
10 that they're relying on.

11 Dropbox owns both the Houston patent
12 that it's relying on and also the Garcia patent.
13 They acquired that from SugarSync in 2014. And we
14 also looked at related litigation filings and
15 provided, you know, a number of examples to
16 Dropbox during the course of that week, including,
17 you know, on Friday afternoon.

18 And that was part of the reason for the
19 two-day extension the following week because we
20 had proposed initially a longer extension so that
21 we could submit this, you know, this evidence;
22 Dropbox opposed.

23 So that two-day extension essentially
24 was just to allow us to, you know, make up for the
25 time that we had spent going through and doing all

1 this, you know, research when we think it was
2 Dropbox's obligation in the first instance to have
3 served the inconsistent information at the time it
4 filed its reply.

5 THE COURT: And why weren't these
6 available to you through your own searching of the
7 record?

8 MR. DAHLGREN: Sure. So, for example,
9 the damages expert report was not, you know,
10 Dropbox had not filed under that performance until
11 March 17. So it wasn't available before then. So
12 it just wasn't possible.

13 Some of the other information, you know,
14 Canada leak. You know, it was out there in the
15 public record. And so, again, we think it was
16 Dropbox, you know, that they had an obligation,
17 to, you know, produce this and, you know, to
18 follow the PTO's rules on routine discovery.

19 But I'm not -- I don't want to
20 characterize this as everything was after
21 Dr. Mowry's deposition. That's just -- that's
22 just not accurate.

23 One of the examples that we had
24 identified was a 2009 Dropbox user guide that we
25 believe is inconsistent with Dropbox's reliance on

1 a SugarSync manual to try to say, you know, they
2 rely on the SugarSync manual, which is a different
3 system, to say this is what a person of origin is
4 still in the yard would understand from these icon
5 overlays that exist in the Houston reference.

6 And so we identified a Dropbox manual
7 that we believe is inconsistent, you know, with
8 that, and was in Dropbox's possession at all
9 times. But that's an example of something that it
10 didn't exist, you know, since 2009.

11 THE COURT: Okay. Just very quickly
12 respond, and if you have any other additional
13 issues, explain what they are.

14 MR. LANTIER: Yes, Your Honor. I will.
15 This is Greg Lantier on behalf of the Petitioner,
16 Dropbox. I am joined by my colleagues, Trishan
17 Efram and Dan Williams, both from Wilmer Hale as
18 well. And Mr. Efram is lead counsel in these
19 IPRs.

20 Your Honor, would you like me to respond
21 on the first issue raised by the Patent Owner
22 which was the Exhibit 2026 and whether the board
23 was correct to deny the request to submit a
24 substitute exhibit the night before the sur-reply
25 was due?

1 THE COURT: Yes, please.

2 MR. LANTIER: Okay. Your Honor, I'll
3 take that issue first, then. And I think the
4 argument that counsel for the Patent Owner raised
5 was that the May 2024 e-mail that the board sent
6 as a courtesy to the Patent Owner after it filed
7 its Patent Owner preliminary response alerting it
8 to the -- what appeared to be the wrong exhibit
9 being attached as 2026 to the POPR, that because
10 that e-mail didn't go to back-up counsel, it only
11 went to lead counsel, that constitutes good cause
12 for submitting the new exhibit the night before
13 the sur-reply is due.

14 I just say that the board denied the
15 patent owner's request because it was untimely,
16 and there was no argument that it wasn't untimely,
17 and whether there would have been good cause is a
18 different point in the proceeding or not, I think
19 is sort of beside the point, given the basis for
20 the board's denial of patent owner's request.

21 But on the good cause point, I don't
22 think that it was the board's responsibility to
23 identify this for the Patent Owner, but the board
24 did do so after the POPR was filed in May of 2024.

25 And then when the Patent Owner filed the

1 POR in November, it attached Exhibit 2026, and it
2 included the provisional that it included as that
3 exhibit, and we responded to that in our reply
4 because that was the exhibit that the Patent Owner
5 included, and presumably we thought did so
6 intentionally.

7 At this point, it would be unfair not to
8 allow the Patent Owner to substitute in a
9 different exhibit that we would not have an
10 opportunity to respond to in briefing.

11 And so I would say that I think the
12 board's original ruling that the request was
13 untimely coming the night before the sur-reply was
14 due, was correct. I would be happy to answer any
15 additional questions you have on that.

16 Otherwise, I would move to the second
17 issue that the Patent Owner raised, and that's the
18 issue of whether it should be permitted to submit
19 briefing asking to add new evidence to this
20 proceeding, and under the pretext that there the
21 evidence would show inconsistency between
22 Dropbox's position and these IPRs and positions
23 Dropbox has taken elsewhere.

24 The first thing I would say, and I want
25 to make sure that this is clear, is that there are

1 no inconsistencies. None of the information that
2 the Patent Owner has pointed to is in any way
3 inconsistent with any position taken by Dropbox or
4 taken in the declaration of Dr. Mowry or
5 declarations of Dr. Mowry in these proceedings.

6 The problem here is that the Patent
7 Owner is not following the rules. The briefing
8 process in IPRs exist for a reason, and all of the
9 arguments that the Patent Owner wants to make --
10 need to be made in the Patent Owner response so
11 that we have a fair opportunity to respond to
12 them.

13 Here the Patent Owner determined not to
14 depose Dr. Mowry prior to submitting its POR. We
15 had presented him for deposition, and the Patent
16 Owner canceled that deposition at about 4:00 the
17 day before it was scheduled to happen, and so that
18 deposition did not occur.

19 And the Patent Owner, although all of
20 these materials with one exception were available
21 prior to the time that it submitted its POR, did
22 not raise any of them in the POR.

23 And now what the Patent Owner would like
24 to do is to submit this information as well as
25 including sur-replies, certain unfounded

1 allegations that we violated for rules which we
2 did not violate as a way to create an implication
3 that something is amiss here when it's not.

4 So the issue isn't responding to any of
5 these materials. I would be happy to respond to
6 any of the materials that they're raising because
7 there's no inconsistency. The problem is time.

8 We, as a matter of professional
9 courtesy, have already agreed or had already
10 agreed to three extensions of the sur-reply
11 deadline. We have the oral hearings or hearing in
12 these two IPR proceedings going forward on April
13 23rd, and it would be unfair for the Patent Owner
14 to be able to submit or put these materials in
15 front of the board and make arguments about their
16 relationship to the petitions without giving us a
17 fair opportunity to respond in writing to those
18 applications.

19 And I just don't think that there's time
20 for that. As I said, if the board is interested,
21 we would be happy to respond on the merits to any
22 of these assertions because they're not correct.

23 As to the expert report that was just
24 recently raised, that was included in a filing on
25 March 17th, there is nothing inconsistent in that

1 expert report, and as compared to what the
2 positions are in the petitions, or what Dr. Mowry
3 has included in his declarations, and that expert
4 report is a damages expert report, it's from a
5 different expert, and I think at best at marginal
6 if any relevance to any statements that were made
7 in these proceedings.

8 I think, you know, at some point the
9 ball has to stop bouncing, and the parties have to
10 have a fair opportunity to prepare for the oral
11 arguments so that the proceedings can move forward
12 in the way they're supposed to with that
13 structure.

14 And this is a situation where the Patent
15 Owner is just raising very late things that could
16 have been raised much, much earlier if they
17 actually were relevant to these proceedings.

18 I think that the board's prior
19 determination that these requests are untimely
20 were correct and the board should not waver in
21 those prior rulings.

22 THE COURT: Is there any issue with
23 respect to the reliance in the sur-reply on the
24 recent deposition of Dr. Mowry, Exhibit 2053?

25 MR. LANTIER: No, Your Honor, we don't

1 agree with some of the characterizations of what
2 Dr. Mowry said during that deposition, but I think
3 the rules do allow for citation to depositions in
4 the sur-replies, so we're not objecting to
5 pointing to Dr. Mowry's deposition.

6 THE COURT: And I believe I understand
7 that other than that expert report by a different
8 expert in a different case that was filed after
9 that deposition, the other documents or
10 information that Patent Owner seeks to rely on
11 preceded that deposition? Is that what I
12 understand at this point?

13 MR. LANTIER: Yes, Your Honor. Not only
14 preceded that deposition, but preceded the filing
15 of the Patent Owner response and were fully
16 available at the time the Patent Owner response
17 was filed.

18 THE COURT: Patent Owner can weigh in on
19 that if he wishes. But so are there any other
20 issues that you want to raise? I believe that
21 you'll file an e-mail regarding a motion to
22 strike.

23 MR. LANTIER: Yes, Your Honor. So the
24 other issue is that in our view, after receiving
25 Your Honor's e-mail ruling denying the request to

1 include the new evidence in the sur-replies, the
2 Patent Owner went ahead and did so anyway, and did
3 so not by attaching those things as exhibits, but,
4 for example, there's a very long block quote from
5 the exhibit that Patent Owner would now like to
6 submit as Exhibit 2026, as the replacement of
7 Exhibit 2026 in the sur-reply in the 286 IPR
8 matter.

9 And then there are various places where
10 they are saying that -- where the Patent Owner is
11 saying that Dropbox had made an inconsistent
12 statement earlier, and including a quote from the
13 very evidence that Your Honor had said the Patent
14 Owner was not allowed to include at this point
15 because their request was untimely.

16 And so we believe that the right way
17 forward here would be to redact out the materials
18 that were improperly included and file corrected
19 sur-replies so that the board is not looking at
20 materials that it said should not be included as
21 part of those filings.

22 THE COURT: So the schedule owner
23 provides the motion to exclude to April 4th. Is
24 that -- would that be a sufficient mechanism for
25 addressing this issue?

1 MR. LANTIER: I think it would, Your
2 Honor. And we did file objections yesterday to
3 these portions of the sur-reply as well. And so
4 if the most expeditious way to move forward here
5 is to do a motion to exclude, that's perfectly
6 appropriate from the Petitioner's standpoint, and
7 we can move forward in that way.

8 THE COURT: Anything else? I'd like to
9 hear from Patent Owner, if not.

10 MR. LANTIER: No, Your Honor. Thank
11 you.

12 MR. DAHLGREN: Yes, Your Honor. This is
13 Derek Dahlgren for Patent Owner. With respect to
14 the provisional patent application, we did cite to
15 that in our sur-reply.

16 It's incorporated by reference in the
17 Houston patent that's Exhibit 1003. The law
18 settled that it's part of the disclosure of that
19 patent, and so we think that there's nothing
20 improper by, you know, citing to it.

21 In abundance of caution we do want to
22 include the exhibit, but we do believe that that
23 disclosure is part of Exhibit 1003 for all intents
24 and purposes by that incorporation by reference.
25 And there's, you know, black letter law on

1 incorporation by reference, you know, to support
2 that.

3 With respect to just -- I just wanted to
4 touch on briefly the idea that we, you know,
5 somehow earlier --

6 THE COURT: Counsel, do you have a cite
7 for that black letter law?

8 MR. DAHLGREN: Yes, Your Honor. One
9 second. One example would be Finjan v. ESET.
10 That's 51 F.4th 1377. Pincite is 1382. Patents
11 that are incorporated by reference are effectively
12 part of the host patent as if they were explicitly
13 contained therein.

14 And that decision is actually citing to
15 an opinion from the federal search hit X2Y
16 Attenuators, LLC versus US International Trade
17 Commission 757 F.3d 1358. And the pincite is 1362
18 through 63. So that's just an example.

19 THE COURT: Thank you.

20 MR. DAHLGREN: And with respect to the
21 earlier Mowry deposition, we had notified
22 Petitioner that we had a conflict. He remembers
23 we were dealing with an emergency application for
24 a temporary restraining order and motion for
25 preliminary injunction.

1 We had requested alternative dates.
2 They said Dr. Mowry is only available on this one
3 date in October, and so we were forced to cancel
4 the deposition. After we canceled, Petitioner
5 came back and complained that Dr. Mowry is in fact
6 available on a different date, and -- but that
7 was, you know, after we had already canceled.

8 So I do take issue with the reference to
9 that and somehow that that is, you know, we're to
10 blame for the situation. So I just want to be
11 clear about that.

12 And, again, you know, with Exhibit 2026,
13 going back to that, we believe it's part of
14 Exhibit 1003 and should be considered. We did
15 make some passing references to other materials,
16 but I think Petitioner is not characterizing that
17 correctly in terms of how we did that in our
18 sur-replies.

19 But again, we wanted to identify some of
20 the examples. With that being said, we would
21 have, you know, pointed to for purposes, again, of
22 making sure that this issue is preserved on
23 appeal. Given the timing the sur-reply being due
24 that same day that we received notification from
25 the board, you know, there just wasn't really time

1 to do anything else. But, you know, we're fully
2 prepared to respond to any, you know, motion to
3 exclude or strike that Petitioner may file.

4 And also because the schedule
5 contemplates, you know, that briefing, we think
6 that there's no added burden to brief the issue of
7 this, you know, inconsistent methods that we've
8 identified in parallel with that, you know, we
9 think that it can be done in the same time as that
10 briefing.

11 And in fact, you know, we would be
12 prepared to file a motion as early as, you know,
13 Wednesday of next week if the board authorized us
14 to do so.

15 THE COURT: Okay. Anything more from
16 Petitioner?

17 MR. LANTIER: Your Honor, I think it's
18 probably not a good idea to get into the back and
19 forth on the deposition of Dr. Mowry. We did not
20 just offer one date for his deposition, and the
21 Patent Owner agreed to that deposition. We
22 traveled to Pittsburgh to prepare for it and then
23 to prepare Dr. Mowry, and so I don't agree with
24 the characterization, and that's fine.

25 On the more important issue of this

1 very, very late raised, supposedly inconsistent
2 information, the problem is that it's -- it is a
3 sandbag. They can file a motion, and they can say
4 all manner of things about things being
5 consistent, and we would need to have a fair
6 opportunity to respond to that on the substance
7 and show the board whether it was inconsistent or
8 not.

9 It clearly was not, and we could show
10 the board that for anything they raised, but right
11 now we don't even have notice of what it is
12 specifically they would be raising in that motion.
13 And we're very close in time to the oral hearing
14 here to be arguing about new evidence.

15 THE COURT: Okay.

16 MR. LANTIER: Also, Your Honor, the one
17 thing I found, on the new argument that the
18 provisional that they now would like to include as
19 a substitute for Exhibit 2026 was already in the
20 record because it's incorporated by reference. I
21 don't think it's the same issue that was raised in
22 the two cases that the Patent Owner pointed to.

23 The issue here is one of fair notice of
24 the evidence and arguments that the Patent Owner
25 is putting forth so that the Petitioner has an

1 opportunity to respond to them in the reply.

2 And so whether we -- even if the board
3 were to find that any document that's referenced
4 in a patent is sort of incorporated into that
5 patent and not separate evidence, it would still
6 by a new argument and still improper for that
7 reason.

8 At some point --

9 THE COURT: Please, I think I've heard
10 enough. Stand back for a minute. Okay.

11 Okay. At this point, we'll take this
12 matter under advisement, and thank you both for
13 your presentations, and we'll get back to you as
14 soon as possible.

15 Patent Owner, please get the transcript
16 on file as soon as possible.

17 MR. DAHLGREN: Yes, Your Honor.

18 THE COURT: This concludes the
19 conference.

20 (Conference call concluded at 2:36 p.m.)
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22
23
24
25

1 State of Maryland

2 City of Baltimore, to wit:

3 I, Ahuva Goldberger, a Notary Public of
4 the State of Maryland, City of Baltimore, do
5 hereby certify that the within-named witness
6 personally appeared before me at the time and
7 place herein set out, and after having been duly
8 sworn by me, according to law, was examined by
9 counsel.

10 I further certify that the examination
11 was recorded stenographically by me and this
12 transcript is a true record of the proceedings.

13 I further certify that I am not of
14 counsel to any of the parties, nor in any way
15 interested in the outcome of this action.

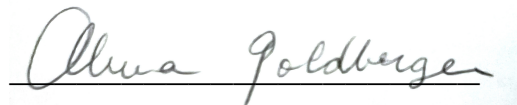
16 As witness my hand and notarial seal this
17 28th day of March, 2025.

18

19

20

21

A handwritten signature in cursive script that reads "Ahuva Goldberger". The signature is written in dark ink on a light blue background.

22

Ahuva Goldberger

23

Notary Public

24

My Commission Expires:

25

May 21, 2027

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