

From: [Trials](#)
To: [Derek Vandenburg](#); [Trials](#)
Cc: [Aaron W. Pederson](#); [Nate D Louwagie](#); [Ryan Rypka](#); [Peter M Kohlhepp](#); [Hayes, Jennifer](#); [Stringfield, Daniel](#); [Christopher, Angelo](#); [Zheng, Helena](#)
Subject: RE: Qualcomm Inc. v. Network Systems Technologies, LLC, IPR2024-00338, -01081
Date: Friday, November 1, 2024 3:32:04 PM

Counsel,

In response to the October 31, 2024, email from Petitioner's counsel, the Board authorizes Petitioner to file a motion to submit the supplemental information identified as items (1) and (2) in the October 31 email under 37 C.F.R. § 42.123(a)-(b). The motion must not exceed eight pages and must be filed within five business days of the date of this email. The Board also authorizes Patent Owner to file an opposition to the motion. The opposition must not exceed eight pages and must be filed within ten business days of the date of this email. The Board does not at this time authorize a reply to the opposition.

Best regards,
Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Derek Vandenburg <DVandenburg@carlsoncaspers.com>
Sent: Thursday, October 31, 2024 10:28 PM
To: Trials <Trials@USPTO.GOV>
Cc: Aaron W. Pederson <APederson@carlsoncaspers.com>; Nate D Louwagie <NLouwagie@carlsoncaspers.com>; Ryan Rypka <RRypka@carlsoncaspers.com>; Peter M Kohlhepp <PKohlhepp@carlsoncaspers.com>; Hayes, Jennifer <jenhayes@nixonpeabody.com>; Stringfield, Daniel <dstringfield@nixonpeabody.com>; Christopher, Angelo <achristopher@nixonpeabody.com>; Zheng, Helena <hzheng@nixonpeabody.com>
Subject: Qualcomm Inc. v. Network Systems Technologies, LLC, IPR2024-00338, -01081

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Dear Board:

We represent Petitioner Qualcomm Incorporated ("Petitioner") in IPR2024-00338 and joined IPR2024-01081. Pursuant to 37 C.F.R. § 42.123(a) Petitioner respectfully requests authorization to file a motion to submit supplemental information. Petitioner's IPR (IPR2024-01081) was instituted and then joined to the -00338 IPR on Oct. 1, 2024. Petitioner's request is thus timely under 37 C.F.R. § 42.123(a)(1). Petitioner seeks to file a motion to submit (1) the Declaration of Dr. Sylvia Hall-Ellis, which is relevant to the instituted claims in that it opines regarding the public availability and authenticity of Exhibit 1007 (K. Goossens, et al., *Guaranteeing the Quality of Services in Networks on Chip* ("Goossens2003")) and (2) the attorney declaration of Mr. Ryan Rypka and various referenced papers regarding the authenticity of exhibits various exhibits.

While item (2) is largely relevant to evidentiary issues, and both items (1) and (2) were timely served on Patent Owner as supplemental evidence on October 28, 2024, Patent Owner is taking the position

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that as supplemental evidence (1) and (2) were untimely. In the event the Board were to view the institution date of the earlier Samsung IPR that Qualcomm subsequently joined as the relevant institution date, Qualcomm would also request authorization to file a motion to submit supplemental information under 37 C.F.R. § 42.123(b).

Petitioner understands that Patent Owner opposes the request. Petitioner will follow up shortly with the parties' joint availability for a call with the Board.

Respectfully submitted,
Derek Vandenburg

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