

April 8, 2024

Writer's Direct Contact
+1 (703) 628-7047
pdelaney@devlinlawfirm.com

VIA EMAIL ONLY

Alice E. Snedeker
Duane Morris LLP
1075 Peachtree Street NE, Suite 1700
Atlanta, Georgia 30309
Tel: (404) 253-6915
AESnedeker@duanemorris.com
Counsel for Cisco Systems, Inc.

Re: *UMBRA Techs. Ltd. (UK) et al. v. Cisco Systems, Inc.*,
Case No. 23-cv-903 (W.D. Tex.)

Dear Alice,

We write in response to your follow-on letter of March 22, 2024, on behalf of Cisco Systems, Inc. ("Cisco"), requesting that UMBRA Technologies Ltd. (UK), UMBRA Technologies Limited (CN), and UMBRA Technologies (US) Inc. (collectively, "UMBRA") dismiss its claims based on U.S. Patent No. 11,146,632 ("the '632 Patent") in its complaint filed against Cisco in the Western District of Texas.

At pages 1-3 of Cisco's letter, you essentially repeat the same arguments from your letter of February 23, 2024 regarding two figures selected from a White Paper for The Next-Generation Data Platform for Hyperconvergence, which Cisco asserts was published in March 2016 (the "White Paper"). Cisco again argues without meaningful evidentiary support that the White Paper shows a Cisco system with "the same features of HyperFlex that Umbra accuses of infringement."

We appreciate your engagement on this issue, notwithstanding that Cisco has yet to produce any mapping of prior art products against the claims. It is our understanding, following diligent investigation both in advance of suit and in response to your letters, that the current Cisco offerings accused of infringement operate meaningfully differently than Cisco's products of 2016 and earlier. To the extent those differences are not adequately identified in the claim chart filed with the Complaint, we are happy to provide an updated chart that does so. Our intention was to provide that updated chart by the May 29 deadline for UMBRA's initial infringement contentions. However, given your letter and our desire to clear up any such issues sooner rather than later, we will endeavor to provide a representative chart for claim 1 of the '632 patent sooner (roughly two to three weeks from the date of this letter). We will then move to amend the Complaint accordingly, in the hopes that will resolve your concerns. Of course, we reserve the right

UMBRA TECHNOLOGIES LTD.

Patent Owner Exhibit 2008

Page 1 of 2

to chart additional products and product families relative to the same or additional claims of the patent at the contentions deadline.

Given the above, we do not agree with Cisco's contentions that UMBRA's litigation positions with respect to the '632 patent are without merit. We remain available for discussion and will provide the updated chart as set forth above.

We are happy to discuss these issues at your convenience.

Sincerely,

/s/ Patrick R. Delaney

Patrick R. Delaney