From:	Neil Ozarkar
To:	Trials; Arvind Jairam
Cc:	*bombach-ptab; Ai, Bing (SDO); *esterhay-ptab; *Schnurer-ptab; *kadjo-ptab; jjiang-ptab@perkinscoie.com; *Perkins Service MPS-Greenthread IPR; Greenthread-Monolithic-MS
Subject:	RE: IPR2024-00468, -00469, -00470
Date:	Tuesday, April 23, 2024 2:36:03 PM
Attachments:	image004.png image005.png

IPR2024-00468, -00469, -00470

Your Honors,

To clarify patent owner's email request below, Patent Owner Greenthread LLC also seeks the following discovery, which pertains to whether the Petitions are time barred under 35 U.S.C. § 315(b):

> 4. Communications and agreements relating to joint defense group work or coordination between Petitioner (or its affiliates) and other current or former Petitioners that have filed IPR petitions against Greenthread.

Patent Owner met and conferred with Petitioner prior to sending the present email.

Petitioner's position: Petitioner's position for these discovery requests is as stated below. For #4, Petitioner has no JDG agreement with time-barred entities (Intel, Dell, or Sony) for these patents, this case, or any of Greenthread's prior cases, and therefore there are also no communications related to any such nonexistent agreements. None of the other petitioners are time-barred and Petitioner did, moreover, not participate in their petitions and are not RPIs. Patent Owner's request for discovery onto litigation-specific joint defense agreements is not warranted.

If the Board would find it helpful, the parties can present available dates for a conference call when a panel has been set.

Respectfully,
Neil Ozarkar
Counsel for Patent Owner Greenthread LLC

McKool Smith | Neil Ozarkar
Senior Counsel | Houston, TX | Tel: (713) 485-7310

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From: Trials <Trials@USPTO.GOV>