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Subject: IPR2024-00643; IPR2024-00787; IPR2024-00878
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Dear Board,

Counsel for Petitioner (Hulu and Capital One) writes to seek leave to file a motion to terminate each of the following IPRs:

IPR2024-00643 (Petitioner Capital One and Hulu);
IPR2024-00787 (Petitioner Capital One and Hulu); and
IPR2024-00878 (Petitioner Capital One).

Capital One and Hulu have each entered into separate settlement agreements with Patent Owner that resolve their respective disputes (respectively, the "Capital One Agreement" and "Hulu Agreement"). Accordingly, Petitioner also requests permission to file:

1. A motion by Hulu to keep the Hulu Agreement confidential (Board Only) under 35 U.S.C. 317(b) and 37 C.F.R. 42.74(c) in each of IPR2024-00643 and IPR2024-00787. Hulu is not a petitioner in IPR2024-00878.
2. A motion by Capital One to keep the Capital One Agreement confidential (Board Only) under 35 U.S.C. 317(b) and 37 C.F.R. 42.74(c) in all three proceedings.

Patent Owner's litigation counsel, which is copied on this email, has continued to assert they do not represent Patent Owner in these IPR proceedings. No Power of Attorney has been filed by any counsel for Patent Owner in any of these three proceedings.

Petitioner believes sending a single consolidated email for the three proceedings will simplify the request/authorization process. However, if the Board prefers individual emails for each proceeding, please let us know and we will provide.

Should the Board request a conference call to discuss these requests, please let us know and Petitioner will provide availability.

Best regards,
Erik



IPR2024-00643, -00787, -00878
Ex. 3002

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