Bhattarai, Roshan

From: Pluta, Robert G. <RPluta@mayerbrown.com>
Sent: Monday, September 8, 2025 5:14 PM
To: Erickson, Brian; Heintz, James M.; Minutoli, Gianni; Bhattarai, Roshan; Jay, Michael
Cc: DLA-Samsung-Maxell; FW-CLIENT-Maxell-Samsung-Service
Subject: RE: Samsung/Maxell IPRs--draft email to Board

EXTERNAL MESSAGE

Brian,

The lines from the hearing are the 4/24/25 hearing transcript @ 27:2-29:6 (public). Maxell is still evaluating and reserves the right to cite to one of the following papers from Samsung, each of which is public.

- Samsung's Opposition to Maxell's Motion for Partial Reconsideration of the Court's Order on MSJ. *See* Dkt. No 296 (EDTX) (public)
- Redacted version of Samsung's Sealed Motion for Summary Judgement of Non-infringement of the '241 and '590 patents. *See* Dkt. No 139 (EDTX) (public)
- Redacted version of Samsung's Reply to Response to MSJ. *See* Dkt. No 226 (EDTX) (public)

In light of this, please let us know if you agree no protective order is needed.

Best,

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From: Erickson, Brian <Brian.Erickson@us.dlapiper.com>
Sent: Monday, September 8, 2025 3:49 PM
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Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>
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CAUTION: External Email - Only click on contents you know are safe.

Rob, can you let us know which lines of the transcript you plan to cite for 906/907? You provided them a few months ago, but I cannot recall. If you will do so, we can quickly confirm whether our rebuttal designations would need to include any CBI. I suspect not. Thanks

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Cc: DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>
Subject: Samsung/Maxell IPRs--draft email to Board

EXTERNAL MESSAGE

Jim,

Thanks for the call earlier. With respect to the protective order, we agree that the Board's standard protective order should be entered for the '815 IPR proceedings. We agree a PO does not need to be entered in the '086 and '241/'590 IPRs provided you agree not to submit confidential information in response to our motion. Please confirm.

Below is a draft email to the Board:

Dear Board,

Further to today's conference call, the parties have conferred about the timing of briefing and the necessity for a protective order in the various proceedings.

The parties are amendable to the Board's proposed briefing schedule, provided the -00735, and -0777 hearing can be moved to the next day, 9/25. If this proposal fits with the Board's schedule, the parties suggest it would be more efficient for the Board and the parties that 00735, -00777, -00906, and -00907 be heard on the same day (9/25) in Alexandria, VA.

To the extent that is feasible, the parties agree to the following briefing schedule:

9/15—PO submits its motions to submit supplemental information;
9/22—Petitioner submits its oppositions to the motions;
9/24—PO submits its replies in support of the motions.

The parties also request authorization to submit a motion for entry of the Board's standard protective order in the -00735 and '00777 matters. The parties have agreed that they will not seek to introduce confidential information in the remaining matters subject to the foregoing motions.

Rob

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