

From: [Trials](#)
To: [Sheng, Philip T.](#); [Trials](#)
Cc: [Gasparo, Frank M.](#); [Inge Osman](#); rick.frenkel@lw.com; [Williams, Eliot D.](#); [Guy, Hop](#); [Lynn, Jamie](#); [Paquette, Ian G.](#); [Dhanani, Ali](#); [Zimmerman, Parker G.](#); Lauren.Rosen@lw.com; rebecca.rabenstein@lw.com; fubotv_masterclassiprs.lwteam@lw.com; [DishvMindGeek](#); [DISHvFubo](#); [Wilson, Andrew](#)
Subject: RE: IPR2024-00917, -00918, -00919, -00940
Date: Tuesday, June 24, 2025 2:28:33 PM

Counsel,

Patent Owner is authorized to file a motion to strike in each of these cases. The motion is limited to 10 pages and is due two weeks after the date of this email. Petitioner in each case may file an opposition of no more than 10 pages that is due two weeks after Patent Owner files its motion. Patent Owner is authorized to file a reply in each case of no more than 5 pages that is due one week after Petitioner files its opposition. The panels will not consider any arguments made outside of the authorized briefing.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Sheng, Philip T. <PTSheng@Venable.com>
Sent: Tuesday, June 17, 2025 9:19 AM
To: Trials <Trials@USPTO.GOV>
Cc: Gasparo, Frank M. <FMGasparo@Venable.com>; Inge Osman <inge.osman@lw.com>; rick.frenkel@lw.com; Williams, Eliot D. <Eliot.Williams@BakerBotts.com>; Guy, Hop <hop.guy@BakerBotts.com>; Lynn, Jamie <Jamie.Lynn@BakerBotts.com>; Paquette, Ian G. <IGPaquette@Venable.com>; Dhanani, Ali <ali.dhanani@bakerbotts.com>; Zimmerman, Parker G. <PGZimmerman@Venable.com>; Lauren.Rosen@lw.com; rebecca.rabenstein@lw.com; fubotv_masterclassiprs.lwteam@lw.com; DishvMindGeek <DishvMindGeek@BakerBotts.com>; DISHvFubo <dishvfubo@BakerBotts.com>; Wilson, Andrew <andrew.wilson@BakerBotts.com>
Subject: RE: IPR2024-00917, -00918, -00919, -00940

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Honorable Board,

Petitioner Aylo opposes DISH's request with respect to IPR2024-00940.

As an initial matter, DISH misrepresents its diligence and compliance with the Board’s procedural requirements. DISH’s request for authorization to file a motion to strike was due on Monday, June 16, 2025. See Consolidated Practice Guide at 81. However, DISH did not contact Aylo about its intended motion until **Saturday**, June 14, 2025—not even one business day before DISH’s deadline. Aylo responded to DISH on Monday indicating it would oppose and requested that DISH circulate its proposed email to the Board so that Aylo could include its position. DISH suggests below that there was some failure by Aylo to do so, but DISH did not send Aylo its draft until 3:32 pm EDT and then proceeded to email the Board without waiting for Aylo. Put plainly, had DISH not waited until the last minute to seek authorization from the Board to file a motion to strike, the parties could have met and conferred and submitted a single email to the Board containing all the requirements specified in the Board’s Scheduling Order. Paper 9 at 2. It did not do so.

In an event, Aylo provides its position below. Aylo understands that emails requesting a conference call “may not contain substantive argument.” *Id.* (citing Consolidated Practice Guide at 9–10). However, because DISH included improper argument in its email to the Board, Aylo believes in the interest of fairness it is necessary to respond to DISH’s arguments.

Aylo’s availability for a conference call this week with the Board is as follows:

- Wednesday, June 18, 12pm–4pm ET
- Thursday, June 19, 12pm–4pm ET.

Claim Construction

DISH mischaracterizes the record. In the Petition, Aylo explained that “for purposes of institution, no constructions [were] necessary.” Pet. (Paper 1) at 12. It further noted that the Board “is not bound by the ITC’s constructions” but that the claims are unpatentable “even under the ITC’s constructions.” *Id.* at 13. Aylo did not adopt the ITC’s constructions and in fact expressly reserved the right to challenge them in future proceedings. *Id.*

Moreover, the ITC did **not** construe the term “continuous playback” as DISH represents. Rather, the ITC stated in a footnote that “**Respondents concede[d]**” before the ITC that “**at least in concept**, a person of skill may have understood what it means to ‘achieve continuous playback’ (uninterrupted viewing of the content).” Ex. 1009 at 56, n.11 (emphases added). That is not a construction by the ITC and in fact, the “at least in concept” language is entirely consistent with Aylo’s position that “to achieve continuous playback” is at most “aspirational” and “a goal.” Reply (Paper 45) at 12. The ITC confirmed this by holding: “the phrase ‘continuous playback of the video’ **is the goal sought**.” Ex. 1009 at 58-59 (emphasis added). This eviscerates DISH’s entire argument.

Lastly, Aylo’s Reply responds to a construction raised by DISH for the first time in its POR. Specifically, DISH argued in its POR that “to achieve continuous playback” requires that there be no disruption during playback. *E.g.*, POR (Paper 21) at 10, 21. Aylo is entitled to respond to the extent the Board adopts DISH’s construction. *Axonics v. Medtronic*, 75 F.4th 1374, 1382 (Fed. Cir. 2023)

(“[P]etitioner is entitled under the APA to respond to new claim construction arguments made by a patent owner . . . after an institution decision.”).

Allegedly New Obviousness Theories

Leaning teaches video streaming without clearing the buffer—this is not a new argument. Indeed, Aylo’s Reply relies on the very same embodiment relied on in the Petition for support that Leaning does not require clearing the buffer. *Compare* Pet. at 31 (citing Ex. 1004, 15:3-8) *with* Reply at 8-9 (citing Ex. 1004, 15:3-6). Aylo at most “expands the same argument made in its petition.” *Ericsson Inc. v. Intellectual Ventures I LLC*, 901 F.3d 1374, 1379 (Fed. Cir. 2018); *see also Rembrandt Diagnostics LP v. Alere, Inc.*, 76 F.4th 1376, 1384 (Fed. Cir. 2023) (“[A] reply may be proper if it is responsive and simply expands on previously raised arguments.”). Moreover, Aylo’s arguments are in direct response to DISH’s new construction of “to achieve continuous presentation.” It is bedrock law that “Petitioner must be afforded a reasonable opportunity in reply to present argument and evidence under the new construction.” *Axonics*, 75 F.4th at 1383.

Aylo’s arguments cited by DISH regarding Tp time are in direct response to DISH’s false assertion that Leaning’s Tp time is “set to 10 seconds in Leaning’s only example,” which results in temporal discontinuities. POR at 12 (internal quotation marks omitted); Reply at 7-9. This is **not** Leaning’s only example. As explained in Aylo’s Reply, Leaning includes other examples such as where Tp time can be set to “3 seconds for 4-second sub-files, or where Tp time is user-selectable.” Reply at 8. Aylo is also simply expanding on the same arguments made in the Petition. *Ericsson*, 901 F.3d at 1379. For example, the Petition argued that “Leaning’s player continues to increment and request sequential individually requestable sub-files until ‘Buffer Fullness > Tp seconds.’” Pet. at 47. The Reply points out that if Tp time is set to 3 seconds, Leaning’s player only needs to request one sub-file before Buffer Fullness > Tp seconds. This is hardly a new argument, especially where the Reply relies on the same portion of Leaning as the Petition that discloses that sub-file size could be “between 30% and 130% of the playout time.” *Compare* Reply at 8 (citing Ex. 1004, 12:33-34) *with* Pet. at 24-25 (citing Ex. 1004, 12:8-34).

With respect to “arranging” sub-files, DISH complains of Aylo relying on Leaning’s disclosure of making a note of the play time and checking that each sub-file received is not marked with a later time than the previous one. Reply at 11. Aylo’s Reply is in direct response to DISH’s false assertion that “Leaning only disclos[es] its sub-files being stored and played back in the order in which they are received.” POR at 24; Reply at 11. DISH cannot mispresent Leaning and then try to prevent Aylo from correcting those misrepresentations. Moreover, Aylo cannot be faulted for not anticipating DISH’s erroneous argument that storing sub-files in the order in which they are received and playing them back in that order does not constitute “arranging” sub-files.

We thank the Board for its courtesies and consideration.

Respectfully,

Phil

From: Wilson, Andrew <andrew.wilson@BakerBotts.com>

Sent: Monday, June 16, 2025 4:27 PM

To: Trials <trials@uspto.gov>

Cc: Gasparo, Frank M. <FMGasparo@Venable.com>; Inge Osman <inge.osman@lw.com>; rick.frenkel@lw.com; Sheng, Philip T. <PTSheng@Venable.com>; Williams, Eliot D. <Eliot.Williams@BakerBotts.com>; Guy, Hop <hop.guy@BakerBotts.com>; Lynn, Jamie <Jamie.Lynn@BakerBotts.com>; Paquette, Ian G. <IGPaquette@Venable.com>; Dhanani, Ali <ali.dhanani@bakerbotts.com>; Zimmerman, Parker G. <PGZimmerman@Venable.com>; Lauren.Rosen@lw.com; rebecca.rabenstein@lw.com; fubotv_masterclassiprs.lwteam@lw.com; DishvMindGeek <DishvMindGeek@BakerBotts.com>; DISHvFubo <dishvfubo@BakerBotts.com>

Subject: IPR2024-00917, -00918, -00919, -00940

Caution: External Email

Honorable Board,

Pursuant to Rules 42.5(a), 42.7(a), and 42.20(a) Patent Owner DISH Technologies, L.L.C. hereby requests authorization to file a motion to strike portions of Petitioners' Reply to Patent Owner's Response and certain supporting evidence in the above-referenced proceedings. Patent Owner proposes that, if authorized, the motion to strike would be filed within two weeks of authorization.

Patent Owner is mindful that the Board expects the parties to meet and confer before a movant requests authorization to file a motion. *Activision Blizzard, Inc. v. Acceleration Bay, LLC*, Case IPR2015-01951, Paper 22 (PTAB June 17, 2016). After reaching out to Petitioners' counsel on this issue on June 14th, counsel for Petitioners FuboTV and Petitioner Aylo each indicated that they oppose DISH's request. While Petitioners' counsel each indicated they would provide Patent Owner with a statement of their position to include in this email to the Board, Patent Owner has not yet received those statements as of the time of sending this email. Accordingly, because the Consolidated Trial Practice Guide directs that "authorization to file a motion to strike should be requested within one week of the allegedly improper submission" (Patent Trial and Appeal Board Consolidated Trial Practice Guide (November 2019) at 81), Patent Owner is making the request for authorization today – one week after Petitioners filed their replies. Patent Owner anticipates that Petitioners will respond to this email to indicate their positions and availability in due course.

Patent Owner is available for a conference call with the Board at the following times:

1. Tuesday, June 17, 1pm – 5pm Eastern
2. Wednesday, June 18, 9am – 5pm Eastern
3. Thursday, June 19, 9am – 5pm Eastern

Patent Owner's Position

Patent Owner seeks authorization to move to strike portions of Petitioner's replies, portions of the 130+ page "Supplemental Declaration of Henry Houh" in support thereof, as well as other new

supporting evidence, all of which raise new theories of invalidity that attempt to belatedly fill gaps in the Petition that were identified in PO's Response. In all cases (identified with specificity below for the Board's convenience), Petitioners have made new arguments, based on meaningfully distinct new contentions, relying on previously unidentified portions of the prior art. These new arguments and supporting evidence are therefore improper and should be stricken. See *Wasica Fin. GmbH v. Cont'l Auto. Systems*, 853 F.3d 1272, 1285–87 (Fed. Cir. 2017) (“Rather than explaining how its original petition was correct, [petitioner’s] subsequent arguments amount to an entirely new theory of prima facie obviousness absent from the petition. Shifting arguments in this fashion is foreclosed by statute, our precedent, and Board guidelines.”); *Intelligent Bio-Systems, Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1369 (Fed. Cir. 2016) (“Unlike district court litigation—where parties have greater freedom to revise and develop their arguments over time and in response to newly discovered material—the expedited nature of IPRs bring with it an obligation for petitioners to make their case in their petition to institute.”); *Laboratoire Francais Du Fractionnement Et Des Biotechnologies S.A. v. Novo Nordisk Healthcare AG*, IPR2017-00028, Paper 109 (FWD) at 17-18 (PTAB Apr. 13, 2022) (striking exhibit that was “used to present a new argument ... inappropriately offered at the reply stage to bolster the bare bones analysis presented in the Petition as to how [a prior art reference] could be interpreted by a POSA to anticipate the challenged claims of the [challenged] patent”).

Additionally, DISH would be severely prejudiced if Petitioners were permitted to rely on these new contentions and voluminous new evidence in Reply because the Scheduling Order does not permit DISH to present rebuttal evidence of its own addressing these new theories and, even if DISH were permitted to introduce new evidence in sur-reply, there is insufficient time remaining in the schedule for DISH to adequately address these entirely new theories, which should have been presented in the Petition originally.

IPR2024-00917, -00918, -00919

**Citations below are to -00919 Reply ('772 Patent) as representative, unless otherwise indicated

- I. New Claim Construction of “achieve continuous playback” - Reply at § II.A
 - A. Petition Construction
 1. “[N]o constructions are necessary.” ’772 Pet., 14-15.
 2. Alternatively, Petitioner alleges that “the asserted grounds render [the Challenged Claims] unpatentable even under the ITC’s constructions.” *Id.* (citing ITC Final Initial Determination (EX1009) at 53-61). Notably, ITC order identified by Petitioner construed “continuous playback” as “uninterrupted viewing of the content.” EX1009, 56
 - B. New Construction in Reply – Petitioner argues for the first time that “achieve continuous playback” is “not limiting” and does not require uninterrupted viewing, in express contradiction to the ITC construction the Petition relied upon. ’772 Reply, 1.
 - C. Basis for Motion – Petitioner’s reply construction is an improper “new [] argument ... that it could have presented earlier, e.g. to make out a prima facie case of unpatentability.” CTPG, 73.
 - D. Materials to Strike – Reply § II.A; EX1026 (Houh2) §§ V.B; VII; EX1045 (U.S. Pat. App. Publ. No. 2003/0135631 A1 (“Li”)); EX1049 (U.S. Pat. No. 6,304,297 (“Swan”).

II. New Obviousness Theories

A. New Proposed Modification of Leaning to Operate “Without Clearing the Buffer”

1. Petition Theory – The Petition relied on Leaning’s “Stepup” function, which expressly clears the buffer at each rate shift, as allegedly disclosing the “continuous” limitation. ’772 Pet., 39-40.
2. New Theory in Reply – Petitioner argues in Reply that “by running the sound card ‘at the highest sampling rate envisaged’ and up-sampling all audio to the highest rate before placement in the buffer, the system can adjust the communicated data rate based on network conditions without clearing the buffer” (’772 Reply, 3-4), and that “POSITAs would have understood Leaning’s teachings that clearing the buffer can be avoided by running the sound card continuously at the highest sampling rate would apply to video decoding and video cards” (’772 Reply, 10).
3. Basis for Motion – Petitioner abandons the “Stepup” function theory in its petition and shifts its argument to allege that a POSITA would have been motivated to modify Leaning so it operates without clearing that buffer.
4. Materials to Strike – ’772 Reply, 3-4, § II.B.3; Houh2 § VII.C

B. New Proposed Modification of Leaning to Modify “Playout Time/Threshold” Tp To Be Smaller Than the Sub-File Size

1. Petition Theory – The Petition expressly relied on a “10 second” Playout Threshold (Tp) in meeting limitations of each Challenged Claim. 772 Pet., 31 (“The player program has a parameter called the playout time Tp. In this example it is set at 10 seconds”). And the Petition repeatedly relied on a “four second” subfile size. Pet., 24-25 (repeatedly citing “four second” sub-files).
2. New Theory in Reply – Petitioner argues in Reply that setting the playout time, Tp, to less than the length of a sub-file size will allow playback to begin immediately after the buffer is cleared. ’772 Reply, 5; see also Houh Decl. § VII.
3. Basis for Motion – Petitioner in Reply abandons the disclosed 10 second threshold theory and relies on an entirely different configuration of Tp, and thus a new modification of Leaning not disclosed in the Petition.
4. Materials to Strike – ’772 Reply, 5; Houh2, ¶¶46-49, 72-75, 17-28, 25-51.

C. New Proposed Interpretation of Leaning’s “Clear Buffer” Instruction As Allegedly Meaning “allowing the remaining buffer content to play until it empties”

1. Petition Theory – The Petition did not advance any particular interpretation of Leaning’s “Clear Buffer” instruction.
2. New Theory in Reply – Petitioner in Reply argues that “clearing the buffer would be achieved by allowing the remaining buffer content to play until it empties,” which would avoid interruptions to playback. ’772 Reply, 5; see also Houh Decl. § VII.C (¶¶ 80, 84).
3. Basis for Motion – Petitioner’s new interpretation of Leaning’s “Clear Buffer” instruction is used to supplement a “bare bones” Petition analysis.

4. Materials to Strike – '772 Reply, 5; see also Houh2 § VII.C (¶¶ 80, 84).
- D. New Proposed Modification of Leaning to Use Undisclosed Encoding Formats and Techniques
1. Petition Theory – The Petition ignored Leaning's express disclosure of "serious" issues with rate shifting video (i.e., mistracking), and did not identify any video encoding format or configuration as allegedly meeting the claims.
 2. New Theories in Reply
 - a) New and Undisclosed Video Encodings – Petitioner now argues in Reply that Leaning's audio disclosure could be applied to video to achieve continuous playback by coding each frame "independently" using Motion JPEG2000. 772 Reply, 6; see also Houh Decl. § VIII.A (specifically ¶¶ 92-97); EX1046 (Motion JPEG2000).
 - b) New and Undisclosed Encoding Techniques to Resolve Mistracking – Petitioner argues for the first time that "By holding the group of pictures/frames for each sub-file constant across the encoding at different bitrates, an I-frame would be included at every sub-file's beginning. Encoding these sub-files at different rates would not change the location of the I-frames." 772 Reply, 7. Petitioner also argues that "the problem can be solved by using the principle described in' another patent." '772 Reply, 7-9.
 - c) New and Undisclosed Segmentation Order – Petitioner abandon's the petition's reliance on Leaning's encode and then segment approach (772 Pet., 22, 25, and 25 (each relying on Leaning at 6:21-26)), now arguing in Reply that Leaning's video files could instead be segmented then encoded. 772 Reply, 8.
 3. Basis for Motion –In Reply, Petitioner pivots to entirely new modifications to Leaning with new encoding formats, techniques, and processes, creating an entirely new invalidity theory in reply. These new theories are inappropriate and prejudicial to PO as explained above.
 4. Materials to Strike – 772 Reply, 6; EX1046 (Dufaux & Ebrahimi, Motion JPEG2000 for Wireless Applications); Houh Decl. § VIII.A (¶¶ 92-100); EX1046 (Motion JPEG2000); EX1049 (U.S. Pat. No. 6,304,297 ("Swan"); Houh Decl. § VIII.B (specifically, ¶¶ 104-120, 122-125; EX1057 (Lee, (Iterative key frame selection in the rate-constraint environment"); EX1058 (Yuan et al., "A Novel Method of Keyframe Setting in Video Coding"); EX1061, 1062, 1063 (New Akiyo videos that are not functional on PTACTS).
- E. New Proposed Modification to Meet "Independently ... Playable" Limitations ('156 Reply § II.E (Claims 5 and 15)
1. Petition Theory – The Petition does not address the "independently ... playable" aspect of Claims 5 and 15.
 2. New Reply Theory – Fubo argues that "POSITAs would have known how to avoid [mistracking] issue[s] and would have instead coded the segments to ensure they were independently playable ... PO's segments could be

- modified such that the frames would be in [] order.” Reply, 16-19.
3. Basis for Motion – Petitioner provided no Petition analysis on this limitation and improperly attempts to supplement that deficiency in its Reply with entirely new theories.
 4. Materials to Strike – ’156 Reply, 16-19; Houh2, ¶¶168-178.

IPR2024-00940

- I. New Claim Construction of “achieve continuous playback” - Reply at § II
 - A. Petition Construction
 1. Same as for FuboTV above.’234 Pet., 12; see also ’234 Pet, 12-15.
 - B. New Construction in Reply – Petitioner argues for the first time that “achieve continuous playback” is “merely aspirational” and not limiting. ’234 Reply, 4.
 - C. Basis for Motion – Same as for FuboTV above.
 - D. Materials to Strike – Reply § II; EX1022 (Houh2) § III.
- II. New Obviousness Theories
 - A. New Argument that “Leaning Teaches Video Streaming Without Clearing the Buffer”
 1. Petition Theory – The Petition relied on Leaning’s “Stepup” function, which expressly discloses clearing a buffer at each rate shift (highlighted below), as allegedly disclosing the “continuous” limitation. ’234 Pet., 32-34.
 2. New Theory in Reply – Petitioner argues the following for the first time in Reply
 - a) “[b]y running the sound card at the highest sampling rate possible and up-sampling sub-files before or after buffering, there is no need to reset the sound card and no need to clear the buffer” (’234 Reply, 4),
 - b) “a POSITA would understand that ... there would be no need to clear the buffer” (’234 Reply, 4),
 - c) “POSITAs would understand that video such as MPEG would have been decoded using software incorproated into the player program” (’234 Reply, 5) and
 - d) “A POSITA would understand that video such as MPEG would have been decoded using software incorporated into the player program. It would not make sense to clear the buffer because there would be no video card that required re-setting and no interruptions upon rate switching since every sub-file begins with an independently decodable I-frame.” (’234 Reply, 5).
 - e) “one of Leaning’s goals is to prevent disruption and achieve continuous playback.” (’234 Reply, 12).
 3. Basis for Motion – Same as for FuboTV above.
 4. Materials to Strike – ’234 Reply, § 3.A – 3B; Houh2 § 4.A–B, ¶128.
 - B. New Proposed Modification of Leaning to Modify “Playout Time/Threshold” Tp and Sub-File Size

1. Petition Theory – The Petition expressly relied on requesting multiple sub-files before Tp is reached. 234 Pet., 47-48 (“Leaning explains in its flowchart (excerpted and annotated below) that Leaning’s player continues to increment and request sequential individually requestable sub-files until “Buffer Fullness > Tp seconds.” EX1004, 10. Thus, Leaning’s player requests a plurality of sub-files (shown in the red boxes in the annotated flowchart, requesting 000000.bin, 000001.bin, etc.) until the buffer exceeds Tp seconds.”) And the Petition repeatedly relied on a “four second” subfile size. Pet., 24, 26 (repeatedly citing “four second” sub-files).
 2. New Theory in Reply – Petitioner argues for the first time that setting the playout time, Tp, to less than the length of a sub-file size will allow playback to begin immediately after the buffer is cleared. ’234 Reply, 7-9.
 3. Basis for Motion – Same as for FuboTV above.
 4. Materials to Strike – ’234 Reply, 7-9; Houh2 § IV.C.
- C. New Proposed Interpretation of Leaning’s “Clear Buffer” Instruction As Allegedly Meaning “allowing the remaining buffer content to play until it empties”
1. Petition Theory – The Petition did not advance any particular interpretation of Leaning’s “Clear Buffer” instruction.
 2. New Theory in Reply – Petitioner argues for the first time in Reply that “clear buffer” in Leaning means “playing out the content remaining in the buffer (i.e., let the buffer ‘clear’ by playing out all the sub-files therein)” which would allegedly avoid interruptions to playback. ’234 Reply, 9.
 3. Basis for Motion – Same as for FuboTV above.
 4. Materials to Strike – ’234 Reply, 9; Houh2 ¶¶ 14, 23, 31-32.
- D. New Theory That “Making a Note of the Play Time” in Leaning’s Decode Process Discloses or Suggests “arranging” sub-files.
1. Petition Theory – The Petition relied on Leaning’s “sequential” file request and decode process. 234 Pet., 35.
 2. New Theory in Reply – Petitioner argues for the first time in Reply that “Leaning [] contemplates that its player ‘make[es] a note of the play time of the sub-file,’” and that “a POSITA would have understood [that] ensures sub-files are written into the buffer in the correct play time order.” 234 Reply, 11.
 3. Basis for Motion – New theory and evidence.
 4. Materials to Strike – 234 Reply, 11; Houh2, ¶¶25-27.

Thanks,

Andrew Wilson

T +1.202.639.1312

M +1.301.807.6646

F +1.202.508.9336

Baker Botts L.L.P.

700 K Street, NW
Washington, D.C. 20001

Confidentiality Notice:

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.

This electronic mail transmission may contain confidential or
privileged information. If
you believe you have received this message in error, please
notify the sender by reply
transmission and delete the message without copying or
disclosing it.

