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Subject:	IPR2024-00917, -00918, -00919, -00940
Date:	Thursday, March 13, 2025 9:11:18 AM

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Dear Honorable Board,

Patent Owner writes to address the following issues involving confidential exhibits submitted on February 28, 2025, with its Patent Owner Responses in the above-captioned cases.

1. Patent Owner requests that the three extra copies of the Patent Owner Response (Papers 28-30) and Exhibits 2011-2142 filed on February 28, 2025, in IPR2024-00919, and the one extra copy of the Patent Owner Response (Paper 21) and Exhibits 2007, and 2011-2142 filed on February 28, 2025, in IPR2024-00940 be expunged. The duplicate copies resulted from an upload lag error during submission of the Patent Owner Responses. Patent Owner intends that, after expunging the duplicate copies, the record in each case will include one copy of the Patent Owner Response and Exhibits, except that certain confidential exhibits will have a public and confidential version (as described in more detail directly below).
2. In each of the above-captioned cases, Patent Owner has now filed public, redacted versions of Exhibits 2041, 2042, 2043, 2067, 2081, 2088, 2104, 2105, 2107, 2108, 2109, 2110, 2116, and 2117, which were initially filed under seal. With regard to Exhibit 2141, Patent Owner has now confirmed that it does not include any confidential materials and has therefore filed an unredacted public version of that exhibit in each case.
3. Finally, Patent Owner identified certain confidential exhibits filed under seal which inadvertently did not include the "PROTECTIVE ORDER MATERIAL" branding described by the Default Protective Order. Accordingly, Patent Owner seeks leave to re-file confidential Exhibits 2104, 2105, 2107, 2108, 2109, 2110, 2116, and 2117 with the "PROTECTIVE ORDER MATERIAL" branding and requests that the Board subsequently expunge the unbranded versions of these exhibits. Petitioners in each of the above-captioned cases have indicated that they do not oppose Patent Owner's request.

Please let us know if we can provide any additional information.

Thanks,

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