From: Kristopher Davis <kdavis@raklaw.com>
Date: October 9, 2024 at 8:29:51 PM PDT
To: "Sim, Charlie" <CSim@gibsondunn.com>
Cc: *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>, *** GDCTMO-Headwater <GDCTMO-Headwater@gibsondunn.com>, HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>, melissa@gillamsmithlaw.com, headwater@raklaw.com
Subject: Re: Headwater v. VZW/TMO (EDTX-352, -379) | Preliminary Election of Asserted Claims

Charlie,

Apologies for the confusion — that was a typo. Instead of 042 claim 15, we intended to identify 042 claim 12. I updated the list below accordingly.

Regards,
Kris

Kristopher Davis
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On Oct 9, 2024, at 11:14 AM, Sim, Charlie <CSim@gibsondunn.com> wrote:

Counsel,

The below identification lists claim 15 for the '042 patent. This is improper; claim 15 was not identified in Headwater's infringement contentions. Please confirm Headwater will drop claim 15 from its identification of asserted claims.

Best,
Charlie

Charlie Sim
Associate Attorney

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From: Kristopher Davis <kdavis@raklaw.com>
Sent: Tuesday, October 8, 2024 4:13 PM
To: *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; *** GDCTMO-Headwater <GDCTMO-Headwater@gibsondunn.com>; HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>; melissa@gillamsmithlaw.com
Cc: headwater@raklaw.com
Subject: Headwater v. VZW/TMO (EDTX-352, -379) | Preliminary Election of Asserted Claims

Counsel,

Please find below Headwater's preliminary election of asserted claims:

-
- 042 patent — claims 1, 3, 5, 6, 9, 12, 13
- 541 patent — claims 41, 42, 45, 47, 55, 57, 79, 83, 120, 170
- 543 patent — claims 1, 8, 44, 47, 61, 88, 98, 120
- 613 patent — claims 1, 8, 12, 15, 16, 18, 23

Regards,
Kris

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