From: Carman, Derrick J.
To: Aguilar, Safiya; Morton, Cyrus A.
Cc: LaRoque, Samuel J.; Fahrenkrog, Aaron R.; Tremblay, Emily J.; Jones, William R.; Google-Longitude-IPRs
Subject: RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates
Date: Wednesday, June 4, 2025 5:09:22 PM
Attachments: image001.png
shield-advisory.png
chevron-light.png

External email

Counsel: Thank you for your email. With respect to Dr. Papanikolopoulos in IPR2024-00960, you are correct that his deposition is scheduled for June 25. The reference to June 23 was a typo. We confirm the 8am ET start time on June 25.

Regarding Mr. Ojeda and Ms. Paras, they executed the declarations on behalf of Morningside IP, the translation company that conducted the translations that were submitted. Despite our request that Petitioner forego any such deposition in light of Petitioner's failure to identify any alleged issues with the translations or with the certifications that bear on any issue in the proceeding, we are making Mr. Wu, managing director at Morningside IP, available for deposition on behalf of Morningside IP regarding the declarations.

Regards,
-Derrick

Derrick J. Carman | Partner | 212.980.7442 | He/Him/His
ROBINS KAPLAN LLP

From: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>
Sent: Wednesday, June 4, 2025 12:05 PM
To: Carman, Derrick J. <DCarman@RobinsKaplan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: [EXTERNAL] RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel,

We note that you previously proposed **June 25** for the remote deposition of Dr. Papanikolopoulos in IPR2024-00960. Therefore, we want to check whether your date of June 23 listed below is in error.

If June 23 is in error and you intended **June 25**, we accept June 25 beginning at 8am ET for the remote deposition. If you intended to move the date to June 23, please reconfirm and we can proceed with June 23 at 8am ET.

GOOGLE EXHIBIT 1027
GOOGLE v. 138 EAST
IPR2024-00958

As to our request to depose Mr. Ojeda and Ms. Paras, **please confirm that you are declining to make them available**. If so, we will proceed with a remote deposition of Mr. Wu on June 10 at 11am ET.

Regards,
Safiya
Counsel for Petitioner

From: Carman, Derrick J. <DCarman@RobinsKaplan.com>
Sent: Tuesday, June 3, 2025 5:11 PM
To: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel: We confirm an 8am ET start time for Dr. Papanikolopoulos' remote deposition on June 23.

Regarding the depositions related to translations performed by Morningside IP, Sam Wu, managing director at Morningside IP, is available for remote deposition on June 10 at 11 ET to testify regarding the contents of the declarations by Morningside IP. Please confirm whether Petitioner intends to proceed with Mr. Wu's deposition on that date.

Regards,
-Derrick

Derrick J. Carman | Partner | 212.980.7442 | He/Him/His
ROBINS KAPLAN LLP

From: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>
Sent: Tuesday, June 3, 2025 9:20 AM
To: Carman, Derrick J. <DCarman@RobinsKaplan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: [EXTERNAL] RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel,

We are circling back on the message below.

Please confirm the 8am or 7am ET start time for Dr. Papanikolopoulos's June 25 remote deposition in IPR2024-00960.

Please also advise as to the availability of Mr. Ojeda and Ms. Paras for remote depositions in IPR2024-00958 and IPR2024-00960, respectively.

Regards,

Safiya
Counsel for Petitioner

From: Aguilar, Safiya
Sent: Monday, May 26, 2025 11:59 AM
To: Carman, Derrick J. <DCarman@RobinsKaplan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel,

Thank you for confirming Dr. Papanikolopoulos's June 12 deposition in IPR2024-00959. We will plan to begin the deposition at 9 am CT at Robins Kaplan's Minneapolis office.

We confirm Dr. Papanikolopoulos's June 25 remote deposition in IPR2024-00960. We propose beginning the deposition at 8am ET but can also accommodate a start time of 7am ET. Please let us know if the proposed time works.

As to Mr. Ojeda and Ms. Paras, we intend to proceed with deposing both. While we cannot promise a time length, we expect that each will be less than a half day. Please advise as to their availability.

Regards,

Safiya
Counsel for Petitioner

From: Carman, Derrick J. <DCarman@RobinsKaplan.com>
Sent: Thursday, May 22, 2025 5:02 PM
To: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel:

We confirm June 12 for Dr. Papanikolopoulos' in-person deposition in IPR2024-00959. Dr. Papanikolopoulos will appear at Robins Kaplan's Minneapolis office.

Dr. Papanikolopoulos is also available for a remote deposition on June 25 in IPR2024-00960. Please note that Dr. Papanikolopoulos will be located in Cyprus for that deposition, which is 7 hours ahead of Eastern Time U.S. We would like to find a mutually agreeable start time so that the deposition occurs at a reasonable time for all participants.

As to Mr. Ojeda and Ms. Paras, we do not believe that their depositions would be fruitful uses of the parties' time and resources. Their declarations speak for themselves, and Petitioner has not identified any specific issues with the translations or with the certifications that bear on any issue in the proceeding. Therefore, in the interest of securing "the just, speedy, and inexpensive resolution to the proceeding" (37 C.F.R. § 42.1(b)), we ask that Petitioner reconsider its requests to take the depositions of Mr. Ojeda and Ms. Paras.

Regards,
-Derrick

Derrick J. Carman | Partner | 212.980.7442 | He/Him/His
ROBINS KAPLAN LLP

From: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>
Sent: Wednesday, May 21, 2025 12:00 PM
To: Carman, Derrick J. <DCarman@RobinsKaplan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: [EXTERNAL] RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Dates

Counsel,

We confirm an in-person deposition of Dr. Papanikolopoulos on **June 12** for IPR2024-00959. Please advise as to Dr. Papanikolopoulos's availability for a remote deposition from **June 23-July 2** for IPR2024-00960.

As to Mr. Ojeda and Ms. Paras, we intend to depose them on the content of their certification.

Regards,

Safiya
Counsel for Petitioner

From: Carman, Derrick J. <DCarman@RobinsKaplan.com>
Sent: Wednesday, May 21, 2025 9:16 AM
To: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>; Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: RE: IPR Nos. IPR2024-00958, -00959, -00960: Deposition Datesg

Counsel: We are in receipt of your requests.

With respect to Dr. Papanikolopoulos, he is not available for an in-person deposition on the dates that you listed due to previously scheduled travel outside of the country. He is available for in person depositions in Minneapolis June 10-12. After those dates, we would need to discuss the possibility of remote depositions.

With respect to Mr. Ojeda and Ms. Paras, could you please explain what testimony you seek and the alleged relevance thereof?

Regards,
-Derrick

Derrick J. Carman | Partner | 212.980.7442 | He/Him/His
ROBINS KAPLAN LLP

From: Aguilar, Safiya <Safiya.Aguilar@finnegan.com>
Sent: Monday, May 19, 2025 3:44 PM
To: Morton, Cyrus A. <CMorton@RobinsKaplan.com>
Cc: LaRoque, Samuel J. <SLaRoque@RobinsKaplan.com>; Fahrenkrog, Aaron R. <AFahrenkrog@RobinsKaplan.com>; Tremblay, Emily J. <ETremblay@RobinsKaplan.com>; Jones, William R. <WJones@RobinsKaplan.com>; Carman, Derrick J. <DCarman@RobinsKaplan.com>; Google-Longitude-IPRs <Google-Longitude-IPRs@finnegan.com>
Subject: [EXTERNAL] IPR Nos. IPR2024-00958, -00959, -00960: Deposition Datesg

Counsel,

We intend to depose the following declarants in each of IPR2024-00958, -00959, and -00960. Petitioner's depositions of Mr. Ojeda and Ms. Paras will be remote. The depositions of Dr. Papanikolopoulos will be in person.

Please confirm their availability for deposition and location during the following dates:

IPR Number	Declarant	Proposed dates
IPR2024-00958	Oscar Ojeda	June 5-6, June 10-12
IPR2024-00959	Nikolaos Papanikolopoulos, Ph.D.	June 25-27, June 30
IPR2024-00960	Nikolaos Papanikolopoulos, Ph.D.	June 23-25, June 27
	Emily Paras	June 5-6, June 10-12

Regards,

Safiya Aguilar

Counsel for Petitioner

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Robins Kaplan LLP
http://www.robinskaplan.com

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the sender by return e-mail and delete it from your mailbox. Thank you.

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