

From: [Stein, Alexander B.](#)
To: "Hunter Adams"; [Doug Bridges](#)
Cc: [Sun, Yalei](#)
Subject: RE: [EXTERNAL] RE: [EXTERNAL] IPR2024-00085 - Introduction to Stefano Brizzolara, Ph.D
Date: Thursday, June 6, 2024 12:22:00 PM
Attachments: [image001.png](#)

Hunter,

Per our conversation yesterday (6/5), I now understand that your client is unwilling to agree not to oppose the IPR petitions and motions for joinder (to IPR2024-00085 and IPR2024-00086, respectively) that our client is considering filing. You indicated that should a sale of your client's business occur with some other entity, then your client might have an obligation to oppose our joinder motions. You seemed to also be implying that if our client would consider entering the sales discussions alongside the other entities in play (including the patent owner, MHL Custom), then that might be a way to secure your client's non-opposition. We also understand that your client has stated to our client that MHL wants to "settle this out" and that "[i]f you guys want us to defend [the IPRs] and get your judgement [sic] overturned, you'll need to beat MHL's offer."

We decline to accept those unusual invitations. Should your client change its mind and wish not to oppose the IPR petitions and motions for joinder under consideration by our client, please do let me know.

Best,

-Alex

Alexander B. Stein

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From: Hunter Adams <hunter@adamsiplaw.com>

Sent: Wednesday, June 5, 2024 10:44 AM

To: Stein, Alexander B. <alexander.stein@morganlewis.com>; Doug Bridges <doug@adamsiplaw.com>

Cc: Sun, Yalei <yalei.sun@morganlewis.com>

Subject: Re: [EXTERNAL] RE: [EXTERNAL] IPR2024-00085 - Introduction to Stefano Brizzolara, Ph.D

[EXTERNAL EMAIL]

Hi Alex,

I just called and left a VM. Please call back at your convenience.

WAYDOO 1024

J. Hunter Adams, Attorney



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From: Stein, Alexander B. <alexander.stein@morganlewis.com>
Sent: Tuesday, June 4, 2024 5:22 PM
To: Hunter Adams <hunter@adamsiplaw.com>; Doug Bridges <doug@adamsiplaw.com>
Cc: Sun, Yalei <yalei.sun@morganlewis.com>
Subject: [EXTERNAL] RE: [EXTERNAL] IPR2024-00085 - Introduction to Stefano Brizzolara, Ph.D

Hi Hunter and Doug,

Just circling back on this. Do you have any time today for a very short conversation? As an update, we have a client that intends to file copycat petitions (i.e., substantively identical) to those filed by your firm in IPR2024-00085 and -00086. We are hopeful that your client can agree not to oppose the motions for joinder. I am available to discuss at your convenience and can be reached on my cell phone at (650) 213-6296.

Best,

-Alex

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From: Hunter Adams <hunter@adamsiplaw.com>
Sent: Monday, June 3, 2024 9:21 AM
To: Stein, Alexander B. <alexander.stein@morganlewis.com>; Doug Bridges <doug@adamsiplaw.com>
Cc: Sun, Yalei <yalei.sun@morganlewis.com>
Subject: Re: [EXTERNAL] IPR2024-00085 - Introduction to Stefano Brizzolara, Ph.D

[EXTERNAL EMAIL]

Hi Alex,

Thanks for the message. Doug and I are meeting today and will be back in touch soon.

J. Hunter Adams, Attorney



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From: Stein, Alexander B. <alexander.stein@morganlewis.com>
Sent: Saturday, June 1, 2024 1:27 PM
To: Hunter Adams <hunter@adamsiplaw.com>; Doug Bridges <doug@adamsiplaw.com>
Cc: Sun, Yalei <yalei.sun@morganlewis.com>
Subject: [EXTERNAL] IPR2024-00085 - Introduction to Stefano Brizzolara, Ph.D

Counsel,

We have a client that might be interested in moving to join the recently instituted IPR2024-00085 proceeding. We are reaching out to inquire as to whether you would consider introducing us to Stefano Brizzolara, Ph.D to discuss retaining them in conjunction with the potential copycat IPR petition under consideration. Please let us know your thoughts and we are available to discuss as needed.

Best,

-Alex

Alexander B. Stein

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