From:	Trials
To:	Saidman, Benjamin; Goldberg, Joshua; Motorola-Headwater-IPRs; rmirzaie@raklaw.com; mfenster@raklaw.com; dchang@raklaw.com; ahayden@raklaw.com; jmilkey@raklaw.com; nrubin@raklaw.com; pwang@raklaw.com; rak_headwater@raklaw.com
Cc:	Trials
Subject:	RE: IPR2024-01180 & IPR2024-01181: District Court Update
Date:	Thursday, October 24, 2024 11:00:10 AM

Counsel,

The Panel denies the request with leave to renew the request if Patent Owner files a Patent Owner's Preliminary Response and raises *Fintiv* as a basis for discretionary denial.

Regards,

Tina

From: Saidman, Benjamin <Benjamin.Saidman@finnegan.com>
Sent: Monday, September 9, 2024 4:43 PM
To: Trials <Trials@USPTO.GOV>
Cc: Goldberg, Joshua <Joshua.Goldberg@finnegan.com>; Motorola-Headwater-IPRs <Motorola-Headwater-IPRs@finnegan.com>; rmirzaie@raklaw.com; mfenster@raklaw.com; dchang@raklaw.com; ahayden@raklaw.com; jmilkey@raklaw.com; nrubin@raklaw.com; pwang@raklaw.com; rak_headwater@raklaw.com
Subject: IPR2024-01180 & IPR2024-01181: District Court Update

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Your Honors,

In IPR2024-01180 and IPR2024-01181, Petitioners Lenovo (United States) Inc. and Motorola Mobility LLC (collectively, "Petitioners") write to notify the Board of a relevant development in the related district court litigation: *Headwater Research LLC v. Motorola Mobility LLC, et al.*, No. 4:23-cv-04496-JST (N.D. Cal.). In that case, the district court entered an order staying the litigation pending the institution decisions in IPR2024-01180 and IPR2024-01181.

Petitioners request permission to file the stay order as an exhibit in each IPR. Petitioners have conferred with Patent Owner Headwater Research LLC, who opposes Petitioners' request.

Respectfully,

Ben Saidman
Backup Counsel for Lenovo (United States) Inc. and Motorola Mobility LLC

Benjamin Saidman
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