
From: Roy Chamcharas <Roy.Chamcharas@klarquist.com>
Sent: Friday, February 14, 2025 10:37 AM
To: Price, Jeffrey H.; Hannah, James; Fuller, Jenna; Keller, Charles; SV Docketing; Kastens, Kris; Finn, Christina; Ramchandani, Shreya; Andre, Paul, J.; Kobialka, Lisa
Cc: John D. Vandenberg; Todd M. Siegel; SAP-Cyandia; Samuel Thacker; Beauchamp, Joe; Soliman, Haytham
Subject: [EXTERNAL] RE: Cyandia v. SAP

Jeff,

We have filed all that we intend to file at this stage. We're available to confer on Tuesday at 11:30 am and 2:30 pm (PST).

Best regards,

Roy

Roy Chamcharas | Partner
Klarquist

P. 503.595.5300 D. 503.473.0984

From: Price, Jeffrey H. <JPrice@KRAMERLEVIN.com>
Sent: Thursday, February 13, 2025 4:47 PM
To: Beauchamp, Joe <jbeauchamp@JonesDay.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Fuller, Jenna <JFuller@KRAMERLEVIN.com>; Keller, Charles <CKeller@KRAMERLEVIN.com>; SV Docketing <svdocketing@KRAMERLEVIN.com>; Kastens, Kris <KKastens@KRAMERLEVIN.com>; Finn, Christina <CFinn@KRAMERLEVIN.com>; Ramchandani, Shreya <SRamchandani@KRAMERLEVIN.com>; Andre, Paul, J. <PAndre@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>
Cc: John D. Vandenberg <john.vandenberg@klarquist.com>; Roy Chamcharas <Roy.Chamcharas@klarquist.com>; Todd M. Siegel <todd.siegel@klarquist.com>; SAP-Cyandia <SAP-Cyandia@jonesday.com>
Subject: RE: Cyandia v. SAP

Counsel,

Please file all of the infringement contentions served or let us know when you are available to meet and confer to resolve this issue.

Best,
Jeff

Jeffrey H. Price
Special Counsel

Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas, New York, New York 10036
T 212.715.7502 F 212.715.8302
JPrice@KRAMERLEVIN.com

Bio

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From: Price, Jeffrey H. <JPrice@KRAMERLEVIN.com>

Sent: Thursday, January 30, 2025 7:43 PM

To: Beauchamp, Joe <jbeauchamp@jonesday.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Fuller, Jenna <JFuller@KRAMERLEVIN.com>; Keller, Charles <CKeller@KRAMERLEVIN.com>; SV Docketing <svdocketing@KRAMERLEVIN.com>; Kastens, Kris <KKastens@KRAMERLEVIN.com>; Finn, Christina <CFinn@KRAMERLEVIN.com>; Ramchandani, Shreya <SRamchandani@KRAMERLEVIN.com>; Andre, Paul, J. <PAAndre@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>

Cc: John D. Vandenberg <john.vandenberg@klarquist.com>; Roy Chamcharas <Roy.Chamcharas@klarquist.com>; Todd M. Siegel <todd.siegel@klarquist.com>; SAP-Cyandia <SAP-Cyandia@jonesday.com>

Subject: RE: Cyandia v. SAP

Counsel,

Cyandia does not object to SAP submitting all the infringement contentions served, which I understand were served on or about August 9, 2024, and had pdf names of Appx. A-D and SC Appx. A-D, as this is the entire set of infringement contentions. Cyandia does not agree to the submission of incomplete portions of the infringement contentions being submitted, which is what you listed below.

Best,
Jeff

Jeffrey H. Price
Special Counsel

Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas, New York, New York 10036
T 212.715.7502 F 212.715.8302
JPrice@KRAMERLEVIN.com

Bio

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From: Beauchamp, Joe <jbeauchamp@jonesday.com>

Sent: Wednesday, January 29, 2025 6:56 PM

To: Price, Jeffrey H. <JPrice@KRAMERLEVIN.com>; Hannah, James <JHannah@KRAMERLEVIN.com>; Fuller, Jenna <JFuller@KRAMERLEVIN.com>; Keller, Charles <CKeller@KRAMERLEVIN.com>; SV Docketing <svdocketing@KRAMERLEVIN.com>; Kastens, Kris <KKastens@KRAMERLEVIN.com>; Finn, Christina

<CFinn@KRAMERLEVIN.com>; Ramchandani, Shreya <SRamchandani@KRAMERLEVIN.com>; Andre, Paul, J.

<PAndre@KRAMERLEVIN.com>; Kobialka, Lisa <LKobialka@KRAMERLEVIN.com>

Cc: John D. Vandenberg <john.vandenberg@klarquist.com>; Roy Chamcharas <Roy.Chamcharas@klarquist.com>; Todd M. Siegel <todd.siegel@klarquist.com>; SAP-Cyandia <SAP-Cyandia@jonesday.com>

Subject: [EXTERNAL] Cyandia v. SAP

Counsel,

SAP plans to file Appendices B, C, and D to Cyandia's supplemental district court infringement contentions as exhibits in IPR2024-01495, and -01496, and -01432, respectively, by February 11. Paragraph 7 of the District Court's Protective Order does not apply to those infringement charts because (1) they were served by Cyandia pursuant to the Patent Local Rules and the Court's Discovery Order (Dkt. No. 33), not in response to any discovery request; (2) they do not bear any confidentiality marking; (3) they cite only publicly available SAP information; and (4) they do not contain Cyandia confidential materials or any third-party confidential materials.

To the extent Cyandia disagrees, please let us know when we can meet and confer by phone and potentially jointly set up a call with Chambers or the Discovery Hotline. If we do not receive a response by Friday, we will proceed with filing the documents described above with the PTAB.

Thanks,

Joe

Joseph M. Beauchamp

Partner

[JONES DAY® - One Firm WorldwideSM](#)

717 Texas, Suite 3300

Houston, Texas 77002

Office +1.832.239.3835

Mobile +1.713.826.5726

jbeauchamp@jonesday.com

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