

From: [Valente, David](#)
To: [Mitch Yang](#); [Steve Schreiner](#); [James Carmichael](#); [Christopher R. Abidin](#); [Multifold IPRs](#); [Robert S Pickens](#); [Amanda Sewanan](#)
Cc: [Hsieh, Courtney A.](#); [PH-Google-Multifold-IPR](#); [T. Vann Pearce Jr.](#); [Christopher J. Higgins](#); [Moss, Geoffrey](#); [Ke, Elaine](#)
Subject: RE: Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058
Date: Monday, November 24, 2025 2:53:42 PM

Mitch,

We never received a response from you on our below questions. Please let us know the answers, including if Multifold and Mr. Sirpal are both refusing to produce those documents to Petitioners in this proceeding. To the extent you do not respond again, we will understand that Multifold and Mr. Sirpal are both refusing.

Additionally, during Mr. Cassar's deposition on November 21, he testified that he had created images and at least one email reflecting the date when software was installed on one or more Imerj devices that were recently powered up. Based on his testimony, that date is after Multifold's alleged reduction to practice and is therefore inconsistent with a position advanced by Multifold during the proceeding. So, the images and email(s) must be produced as part of routine discovery under 37 C.F.R. § 42.51(b)(1)(iii). Please confirm you will produce them immediately. We reserve all rights due to any prejudice associated with Patent Owner's already-late production of these materials.

Mr. Cassar also testified about a waiver and associated email he received from Flextronics releasing him and Mr. Becze from liability for retaining Flextronics's documents in exchange for "cooperating." Given the clear significance of this, as you know, we asked Mr. Cassar if he would provide a copy of this during the deposition. Mr. Cassar indicated that he would get back to us after the deposition. Please confirm whether Mr. Cassar and/or Multifold will provide the waiver document/email, or alternatively, confirm whether Mr. Cassar is refusing to do so.

Best,
David

From: Valente, David
Sent: Friday, November 14, 2025 9:11 PM
To: 'Mitch Yang' <Mitch@carmichaelip.com>; Steve Schreiner <schreiner@carmichaelip.com>; James Carmichael <jim@carmichaelip.com>; Christopher R. Abidin <Chris@carmichaelip.com>; Multifold IPRs <MultifoldIPRs@carmichaelip.com>
Cc: Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR <PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr. <tvpptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss, Geoffrey <gmoss@orrick.com>; Ke, Elaine <eke@orrick.com>
Subject: RE: Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058

Mitch,

Your email did not answer our questions. Were Mr. Sirpal's documents produced in either district court proceeding and, if so, if there is a reason you are not willing to have them be used here? And separately, is Mr. Sirpal no longer willing to share with us in his individual capacity the documents he provided to Multifold? Is Multifold not allowing him to do so? We are surprised because Mr. Sirpal suggested he'd share the documents, but now as apparently counsel for both Multifold and Mr. Sirpal, you are implying that those documents will not be shared.

Please let us know the answers to these questions, and if Multifold and Mr. Sirpal are refusing to produce those documents to Petitioners in this proceeding.

Best,
David

From: Mitch Yang <Mitch@carmichaelip.com>

Sent: Friday, November 14, 2025 2:25 PM

To: Valente, David <davidvalente@paulhastings.com>; Steve Schreiner <schreiner@carmichaelip.com>; James Carmichael <jim@carmichaelip.com>; Christopher R. Abidin <Chris@carmichaelip.com>; Multifold IPRs <MultifoldIPRs@carmichaelip.com>

Cc: Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR <PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr. <tvptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss, Geoffrey <gmoss@orrick.com>; Ke, Elaine <eke@orrick.com>

Subject: [EXT] Re: Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058

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Hi David,

As you know, discovery in IPR is limited. There are only two available categories of production: routine discovery under 37 CFR 42.51(b)(1) and additional discovery under 37 CFR 42.51(b)(2). Multifold provided the documents cited in the witnesses' testimonies. Any other documents do not fall under routine discovery. If you want documents produced as additional discovery under 42.51(b)(2), PTAB precedent puts the burden on you to show that the documents are subject to additional discovery, including by providing a basis beyond the possibility of finding something useful. We will consider your request for any document for which you provide a basis.

Thanks.

Mitch Yang
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From: Valente, David <davidvalente@paulhastings.com>
Sent: Friday, November 14, 2025 1:56 PM
To: Mitch Yang <Mitch@carmichaelip.com>; Steve Schreiner <schreiner@carmichaelip.com>; James Carmichael <jim@carmichaelip.com>; Christopher R. Abidin <Chris@carmichaelip.com>; Multifold IPRs <MultifoldIPRs@carmichaelip.com>
Cc: Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR <PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr. <tvptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss, Geoffrey <gmooss@orrick.com>; Ke, Elaine <eke@orrick.com>
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Mitch,

A fact witness that Multifold submitted a declaration from provided Multitfold with documents that he thought were relevant. To be able to fairly analyze Mr. Sirpal's testimony, we need access to those documents. Is Multifold refusing to produce those documents, whether under routine discovery or additional discovery? Were these documents produced in either district court proceeding and, if so, is there a reason you are not willing to have them be used here?

In addition, counsel for Multifold and Mr. Sirpal represented during the deposition that Multifold's counsel also represents Mr. Sirpal. During the deposition, Mr. Sirpal indicated that "whatever documents they have are available to you through whatever course you need to get to those." Is Mr. Sirpal no longer willing to share the documents he provided to Multifold with us?

Best,
David

From: Mitch Yang <Mitch@carmichaelip.com>
Sent: Friday, November 14, 2025 10:34:01 AM
To: Valente, David <davidvalente@paulhastings.com>; Steve Schreiner <schreiner@carmichaelip.com>; James Carmichael <jim@carmichaelip.com>; Christopher R. Abidin <Chris@carmichaelip.com>; Multifold IPRs <MultifoldIPRs@carmichaelip.com>
Cc: Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR <PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr. <tvptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss, Geoffrey <gmooss@orrick.com>; Ke, Elaine <eke@orrick.com>
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Counsel, We are not aware of any documents that we have not provided that would fall

under routine discovery in 37 CFR 42. 51(b)(1)(i) or (iii). If any specific document(s) were cited by Mr. Sirpal, Cassar, or Becze in their testimony, please

Counsel,

We are not aware of any documents that we have not provided that would fall under routine discovery in 37 CFR 42.51(b)(1)(i) or (iii). If any specific document(s) were cited by Mr. Sirpal, Cassar, or Becze in their testimony, please identify those specific document(s) and we will consider your request.

If you are requesting additional discovery under 37 CFR 42.51(b)(2), what is the basis for your request beyond the possibility of finding something useful?

Thanks.

Mitch Yang

Carmichael IP, PLLC

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mitch@carmichaelip.com<<mailto:mitch@carmichaelip.com>>

From: Valente, David <davidvalente@paulhastings.com>

Sent: Friday, November 14, 2025 9:19 AM

To: Mitch Yang <Mitch@carmichaelip.com>; Steve Schreiner

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Cc: Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR

<PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr.

<tvptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss,

Geoffrey <gmoss@orrick.com>; Ke, Elaine <eke@orrick.com>

Subject: RE: Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058

Counsel,

During Monday's deposition of Sanjiv Sirpal, he testified that he provided you with thousands of documents from his time at Flextronics. Multifold only submitted a very small

subset of those documents as exhibits in this IPR, and you did not let us know the others existed or offer to make them available to us before Mr. Sirpal's deposition. This was highly prejudicial to Petitioners and interfered with our ability to fully examine Mr. Sirpal.

As we requested on the record at the deposition, please produce the full set of documents that Mr. Sirpal provided to you. We reserve all rights to resume Mr. Sirpal's deposition following our review of those documents.

Similarly, if Mr. Cassar and/or Mr. Becze provided documents to Multifold beyond those cited in their declarations, we request Multifold produce those documents immediately so that we have time to review before those depositions.

Please let us know if Multifold agrees to produce these documents.

Best,

David

From: Valente, David <davidvalente@paulhastings.com>
Sent: Friday, November 7, 2025 7:09 PM
To: Mitch Yang <Mitch@carmichaelip.com>; Steve Schreiner <schreiner@carmichaelip.com>; Hsieh, Courtney A. <courtneyhsieh@paulhastings.com>; PH-Google-Multifold-IPR <PH-Google-Multifold-IPR@paulhastings.com>; T. Vann Pearce Jr. <tvptabdocket@orrick.com>; Christopher J. Higgins <0chptabdocket@orrick.com>; Moss, Geoffrey <gmooss@orrick.com>; Ke, Elaine <eke@orrick.com>
Cc: James Carmichael <jim@carmichaelip.com>; Christopher R. Abidin <Chris@carmichaelip.com>; Multifold IPRs <MultifoldIPRs@carmichaelip.com>
Subject: RE: Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058

Mitch,

It will be Vann Pearce, David Valente, and court reporter Jessie Waack.

Best,

David

From: Mitch Yang <Mitch@carmichaelip.com<<mailto:Mitch@carmichaelip.com>>>
Sent: Friday, November 7, 2025 4:47 PM
To: Steve Schreiner <schreiner@carmichaelip.com<<mailto:schreiner@carmichaelip.com>>>;
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Multifold IPRs
<MultifoldIPRs@carmichaelip.com<<mailto:MultifoldIPRs@carmichaelip.com>>>
Subject: [EXT] Deposition of Sanjiv Sirpal in Google / Motorola v Multifold IPR2025-00058

Counsel, Can you please provide the names of the attending attorney(s) and court reporter for Monday's deposition of Sanjiv Sirpal? We need to inform building security. Thanks,
Mitch Yang Carmichael IP, PLLC 8607 Westwood Center Drive, Suite

Counsel,

Can you please provide the names of the attending attorney(s) and court reporter for Monday's deposition of Sanjiv Sirpal? We need to inform building security.

Thanks,

Mitch Yang

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Privacy@paulhastings.com<<mailto:Privacy@paulhastings.com>>.