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Subject: IPR2025-00068, -00070: Joint Notice re Discovery Items
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To the Board,

Yesterday, Director Stewart issued an Order vacating the Board's Decisions granting institution in IPR2025-00068 and -70. The Director also remanded both proceedings to the Board (1) for additional briefing regarding the proper construction of the term "association" and (2) for the Board to issue new institution decisions in light of this additional briefing.

The Parties are jointly contacting the Board regarding two pending discovery issues in these now-vacated proceedings. First, Patent Owner filed a Motion for Additional Discovery in each proceeding on June 20, 2025. The parties agree that this motion is now moot in light of Director Stewart's Order vacating institution in both proceedings, recognizing that Patent Owner may refile the motion in any proceeding instituted by the Board on remand.

Second, Patent Owner noticed depositions of Petitioner's expert, Dr. Markus Jakobsson, on June 9, 2025. (IPR2025-00068, Paper 20; IPR2025-00070, Paper 21). The Parties agree that this deposition is now moot. Petitioner will work with Patent Owner to find a mutually convenient time for a rescheduled deposition in any proceeding instituted by the Board on remand.

If the Board would like to schedule a conference call to discuss any of the above, the parties will provide their availability.

Respectfully,



Paul Hart

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