
From: Jordan Rux <JRux@susmangodfrey.com>
Sent: Thursday, April 24, 2025 3:57 PM
To: Fernando, Ravi; Corey Lipschutz; Pegasus-Verizon-JonesDay; A&B Pegasus; Dacus, Deron; melissa@gillamsmithlaw.com
Cc: Andrea Fair; Chad Everingham; Daniel Shih; Gloria Park; Greg Fisk; Jeff Melsheimer; Joseph Grinstein; Kalpana Srinivasan; Kevin Downs; Kymberli Speedy; Max Tribble; Richard Wojtczak; Robert Greenfeld; Stacy Schulze
Subject: RE: Pegasus v Verizon et al --- Narrowing Asserted Patents

EXTERNAL SENDER – Proceed with caution

Counsel – We don't believe a formal motion is necessary under relevant case law, *Alcon Research Ltd. v. Barr Labs., Inc.*, 745 F.3d 1180, 1193 (Fed. Cir. 2014), but we can put one together if Defendants (and Intervenor) also plan to join the motion. Based on Defendants/Intervenor's motion to impose a claim-narrowing schedule, we assume that Defendants/Intervenor will be withdrawing their counterclaims/invalidity arguments that are based on the patents that Pegasus has withdrawn. Please let us know if that assumption is correct. If so, we will draft the motion to include the Defendants/Intervenor's counterclaims/invalidity arguments related to the withdrawn patents/claims.

For clarity, Pegasus withdrew the 460, 463, 118, and 942 patents, as well as claims 2, 3, 6, 7, 10, and 11 of the '000 patent.

Best,
Jordan

From: Fernando, Ravi <Ravi.Fernando@alston.com>
Sent: Tuesday, April 22, 2025 8:52 AM
To: Corey Lipschutz <CLipschutz@susmangodfrey.com>; Pegasus-Verizon-JonesDay <pegasus-verizon-jonesday@jonesday.com>; A&B Pegasus <A&B-Pegasus@alston.com>; Dacus, Deron <ddacus@dacusfirm.com>; melissa@gillamsmithlaw.com
Cc: Andrea Fair <andrea@millerfairhenry.com>; Chad Everingham <chad@millerfairhenry.com>; Daniel Shih <dshih@susmangodfrey.com>; Gloria Park <GPark@susmangodfrey.com>; Greg Fisk <GFisk@susmangodfrey.com>; Jeff Melsheimer <JMelsheimer@susmangodfrey.com>; Jordan Rux <JRux@susmangodfrey.com>; Joseph Grinstein <jgrinstein@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Kevin Downs <kdowns@susmangodfrey.com>; Kymberli Speedy <KSpeedy@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; Robert Greenfeld <RGreenfeld@susmangodfrey.com>; Stacy Schulze <SSCHULZE@SusmanGodfrey.com>
Subject: RE: Pegasus v Verizon et al --- Narrowing Asserted Patents

EXTERNAL Email

Corey,

Thanks for letting us know. Please confirm that Pegasus will move today to dismiss the four patents in your email.

Sincerely,
Ravi

J. Ravindra Fernando
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From: Corey Lipschutz <CLipschutz@susmangodfrey.com>
Sent: Monday, April 21, 2025 7:35 PM
To: Pegasus-Verizon-JonesDay <pegasus-verizon-jonesday@jonesday.com>; A&B Pegasus <A&B-Pegasus@alston.com>; Dacus, Deron <ddacus@dacusfirm.com>; melissa@gillamsmithlaw.com
Cc: Andrea Fair <andrea@millerfairhenry.com>; Chad Everingham <chad@millerfairhenry.com>; Corey Lipschutz <CLipschutz@susmangodfrey.com>; Daniel Shih <dshih@susmangodfrey.com>; Gloria Park <GPark@susmangodfrey.com>; Greg Fisk <GFisk@susmangodfrey.com>; Jeff Melsheimer <JMelsheimer@susmangodfrey.com>; Jordan Rux <JRux@susmangodfrey.com>; Joseph Grinstein <jgrinstein@susmangodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Kevin Downs <kdowns@susmangodfrey.com>; Kymberli Speedy <KSpeedy@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Richard Wojtczak <rwojtczak@susmangodfrey.com>; Robert Greenfeld <RGreenfeld@susmangodfrey.com>; Stacy Schulze <sschulze@SusmanGodfrey.com>
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Counsel:

In an effort to narrow claims and focus the allegations of infringement in this case, Plaintiff will not include infringement opinions in its expert reports on the following United States Patents:

10,594,460
10,638,463
10,721,118
11,405,942

Respectfully,

Corey

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