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Subject: RE: Request for Conference Call: IPR2025-00167, IPR2025-00168, IPR2025-00169, IPR2025-00170, IPR2025-00171
Date: Wednesday, October 15, 2025 1:20:03 PM

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Dear Board,

Petitioner respectfully requests a Board call to discuss modifying the schedule in IPR2025-00167, IPR2025-00168, IPR2025-00169, IPR2025-00170, IPR2025-00171. Petitioner seeks to move Due Date 2, the date for the Petitioner Rely in the noted proceedings, from November 26, 2025 to December 8, 2025. December 8 is the current Due Date 2 in related proceedings IPR2025-00381 and PGR2025-00016. This schedule change would consolidate the due dates for all these related matters. Petitioner is amenable to correspondingly change Due Date 3 for the Patent Owner Sur-Reply, if Patent Owner so desires. The reason for the request is that while deposition of the Patent Owner's expert (consolidated for all 7 matters) was originally requested for the week of October 20, 2025, Patent Owner's expert is not available until November 13 or 14, 2025. Under the current schedule, this deposition timing leaves Petitioner less than 6 business days after receiving a final deposition transcript to prepare 5 Replies by the November 26 due date – Thanksgiving week. If Patent Owner's expert were available earlier, modifying the schedule would not be necessary.

The parties have met and conferred; Patent Owner opposes modifying the schedule.

The parties are available for a phone call anytime early next week, beginning October 20.

Respectfully,

David O'Dell, lead counsel for Petitioner

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