James Murphy

From: James Murphy
Sent: Thursday, March 26, 2026 12:00 PM
To: 'Tobin, David'; Sitzman, Mike; Best, Timothy; Raymond.Miller; Endejann, Nicole; Neurelis-PTAB
Cc: Mark Deming; Chad Landmon; Corey Casey
Subject: RE: IPR2025-00464, -465, -466 | Depositions of Cartt, Mitchnick, and Hale

David,

As we noted in the meet and confer, those dates are not feasible in view of the schedule for these proceedings. The purpose of the depositions is to inform the arguments for our Petitioner Reply and your proposed dates are well after our reply is due. If you can agree to produce all three witnesses by April 10, we believe we can accommodate such depositions by extending Due Dates 2 and 3 accordingly.

If the witnesses are not timely available, we will proceed to file our reply without deposing them and seek to strike the declarations. It is our understanding from the meet and confer that you believe the Board's order of March 9, 2026 (Paper 38) does not authorize motions to strike in view of the dates you proposed. While we disagree that your proposed dates satisfy the spirit of the Board's order, we will nonetheless email the Board again to confirm authorization to file the motions.

Regards,

James Murphy
Shareholder

jpmurphy@polsinelli.com
713.374.1631
1000 Louisiana Street
Sixty-Fourth Floor
Houston, TX 77002
polsinelli.com

Polsinelli PC, Polsinelli LLP in California

From: Tobin, David <dtobin@mcdermottlaw.com>
Sent: Wednesday, March 25, 2026 4:08 PM
To: James Murphy <jpmurphy@polsinelli.com>; Sitzman, Mike <msitzman@mcdermottlaw.com>; Best, Timothy <tbest@mcdermottlaw.com>; Raymond.Miller <Raymond.Miller@us.dlapiper.com>; Endejann, Nicole <Nicole.Endejann@us.dlapiper.com>; Neurelis-PTAB <Neurelis-PTAB@mcdermottlaw.com>
Cc: Mark Deming <MDeming@Polsinelli.com>; Chad Landmon <clandmon@polsinelli.com>; Corey Casey <CCasey@Polsinelli.com>
Subject: RE: IPR2025-00464, -465, -466 | Depositions of Cartt, Mitchnick, and Hale

EXTERNAL EMAIL dtobin@mcdermottlaw.com

Padagis US LLC, EX1100

Dear Counsel,

We write regarding the above-captioned cases to address the Board's order of March 9, 2026 (Paper 38). We met and conferred today to discuss depositions of the three third-party declarants. We offered you the following dates, subject to the witnesses' final confirmation:

- David Hale: April 29
- Mark Mitchnick: May 5
- Steve Cartt: May 7

Please let us know how you would like to proceed.

Regards,
David

David Tobin
Partner

T: +1 214 210 2793
dtobin@mcdermottlaw.com | LinkedIn

McDermott Will & Schulte LLP | mcdermottlaw.com
2801 North Harwood Street | Suite 2600 | Dallas, TX 75201 | USA

From: James Murphy <jpmurphy@polsinelli.com>
Sent: Tuesday, March 24, 2026 1:16 PM
To: Tobin, David <dtobin@mcdermottlaw.com>; Sitzman, Mike <msitzman@mcdermottlaw.com>; Best, Timothy <tbest@mcdermottlaw.com>; Raymond.Miller <Raymond.Miller@us.dlapiper.com>; Endejann, Nicole <Nicole.Endejann@us.dlapiper.com>; Neurelis-PTAB <Neurelis-PTAB@mcdermottlaw.com>
Cc: mdeming@polsinelli.com; Chad Landmon <clandmon@polsinelli.com>; Corey Casey <CCasey@Polsinelli.com>
Subject: RE: IPR2025-00464, -465, -466 | Depositions of Cartt, Mitchnick, and Hale

[External Email]
Hi David,

11am ET tomorrow is good with us for a meet and confer.

Regards,
James Murphy
Shareholder

jpmurphy@polsinelli.com
713.374.1631
1000 Louisiana Street
Sixty-Fourth Floor
Houston, TX 77002
polsinelli.com

Polsinelli PC, Polsinelli LLP in California

From: Tobin, David <dtobin@mcdermottlaw.com>
Sent: Tuesday, March 24, 2026 9:52 AM
To: James Murphy <jpmurphy@polsinelli.com>; Sitzman, Mike <msitzman@mcdermottlaw.com>; Best, Timothy <tbest@mcdermottlaw.com>; Raymond.Miller <Raymond.Miller@us.dlapiper.com>; Endejann, Nicole <Nicole.Endejann@us.dlapiper.com>; Neurelis-PTAB <Neurelis-PTAB@mcdermottlaw.com>
Cc: Mark Deming <MDeming@Polsinelli.com>; Chad Landmon <clandmon@polsinelli.com>; Corey Casey <CCasey@Polsinelli.com>
Subject: RE: IPR2025-00464, -465, -466 | Depositions of Cartt, Mitchnick, and Hale

EXTERNAL EMAIL **dtobin@mcdermottlaw.com**

James,

Thanks for your email. Please let us know if you are available to meet and confer with us on Wednesday, March 25, from 10 am – 2 pm ET (9 am – 1 pm CT) to discuss.

-David

David Tobin
Partner

T: +1 214 210 2793
dtobin@mcdermottlaw.com | LinkedIn

McDermott Will & Schulte LLP | mcdermottlaw.com
2801 North Harwood Street | Suite 2600 | Dallas, TX 75201 | USA

From: James Murphy <jpmurphy@polsinelli.com>
Sent: Monday, March 23, 2026 5:16 PM
To: Sitzman, Mike <msitzman@mcdermottlaw.com>; Tobin, David <dtobin@mcdermottlaw.com>; Best, Timothy <tbest@mcdermottlaw.com>; Raymond.Miller <Raymond.Miller@us.dlapiper.com>; Endejann, Nicole <Nicole.Endejann@us.dlapiper.com>; Neurelis-PTAB <Neurelis-PTAB@mcdermottlaw.com>
Cc: mdeming@polsinelli.com; Chad Landmon <clandmon@polsinelli.com>; Corey Casey <CCasey@Polsinelli.com>
Subject: IPR2025-00464, -465, -466 | Depositions of Cartt, Mitchnick, and Hale

[External Email]
Counsel,

In the Board's March 9, 2026 order, it instructed the parties to meet and confer again on deposing Messrrs. Cartt, Mitchnik, and Hale after the Board's rehearing decision, which issued on March 20, 2026. Let us know if Patent Owner is now willing to make these three witnesses available to be deposed and their available dates. If Patent Owner declines to make the witnesses available for deposition then we intend to move forward with the motion to strike as previously authorized in the Board's March 9 order.

Regards,

James Murphy
Shareholder

jpmurphy@polsinelli.com
713.374.1631
1000 Louisiana Street
Sixty-Fourth Floor
Houston, TX 77002
polsinelli.com

Polsinelli PC, Polsinelli LLP in California

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