

Exhibit I

From: [Gerard O'Rourke](#)

Mail received time: Mon, 23 Jun 2025 18:58:43

Sent: Monday, June 23, 2025 2:58:44 PM

To: [Plies, Jeffrey](#) [Sean O'Kelly](#)

Cc: [Rita C. Chipperson](#) [Fisher, Michael](#) [Hackman, Blaine](#) [Nate Hoeschen](#) [Laura Carrig](#) [Edwards, Jeffrey](#)

Subject: RE: Zaxcom v. RODE, Motion to Stay - meet & confer

Importance: Normal

Sensitivity: None

Attachments:

[D.I. 98.pdf](#);

Jeff,

How about we talk on Wednesday at 10 am? If that works, please circulate dial-in.

In terms of the fact discovery deadline, Judge Murphy built some slack into the schedule (attached). Fact discovery closes on August 15, but opening expert reports are not until November 7. Given that you are moving to stay, it makes sense to push the fact discovery date back to see how the Court rules. Also, taking depositions during the beginning of August is far from desirable and frequently interferes with vacation schedules – both clients and attorneys. There will also be a claim narrowing after the Markman decision. In light of these events, we propose moving the fact discovery deadline to September 30. The other dates can stay the same. Please run that by your client. Thanks.

Jerry

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From: Plies, Jeffrey <Jeffrey.Plies@dechert.com>

Sent: Monday, June 23, 2025 1:56 PM

To: Gerard O'Rourke <gorourke@okorlaw.com>; Sean O'Kelly <sokelly@okorlaw.com>

Cc: Rita C. Chipperson <rcc@chippersonlaw.com>; Fisher, Michael <Michael.Fisher@dechert.com>; Hackman, Blaine <Blaine.Hackman@dechert.com>; Nate Hoeschen <nhoeschen@shawkeller.com>; Laura Carrig <lcarrig@okorlaw.com>; Edwards, Jeffrey <jeffrey.edwards@dechert.com>

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Jerry,

We are available Tuesday 11-1 ET or Wednesday: 9:30-4 ET.

On the M&C we can discuss a fact discovery extension, but we will need to confer with our client before committing to a position. As a result, please be prepared to give us some specific proposals or options that we can take back to our client. Including, whether any other dates would be moved.

Regards,

Jeff

From: Gerard O'Rourke <gorourke@okorlaw.com>

Sent: Monday, June 23, 2025 11:26 AM

To: Plies, Jeffrey <Jeffrey.Plies@dechert.com>; Sean O'Kelly <sokelly@okorlaw.com>

Cc: Rita C. Chipperson <rcc@chippersonlaw.com>; Fisher, Michael <Michael.Fisher@dechert.com>; Hackman, Blaine <Blaine.Hackman@dechert.com>; Nate Hoeschen <nhoeschen@shawkeller.com>; Laura Carrig <lcarrig@okorlaw.com>; Edwards, Jeffrey <jeffrey.edwards@dechert.com>

Subject: RE: Zaxcom v. RODE, Motion to Stay - meet & confer

Jeff,

We are generally available for a meet and confer tomorrow and Wednesday. Please propose times. During our call, we should also discuss the fact discovery deadline and whether it should be extended.

Also, the joint claim construction brief is due on Friday. We have submitted these using a merged Word document in the past. To that end, would you please send us Word versions of the two claim construction briefs you filed? That would be very helpful.

Very truly yours,

Jerry

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From: Plies, Jeffrey <Jeffrey.Plies@dechert.com>

Sent: Friday, June 20, 2025 2:41 PM

To: 'Gerard O'Rourke' <gorourke@okorlaw.com>; Sean O'Kelly <sokelly@okorlaw.com>

Cc: Rita C. Chipperson <rcc@chippersonlaw.com>; Fisher, Michael <Michael.Fisher@dechert.com>; Hackman, Blaine <Blaine.Hackman@dechert.com>; Nate Hoeschen <nhoeschen@shawkeller.com>; Laura Carrig <lcarrig@okorlaw.com>; Edwards, Jeffrey <jeffrey.edwards@dechert.com>

Subject: Zaxcom v. RODE, Motion to Stay - meet & confer

Jerry,

As mentioned on our call earlier this week, Defendants intend to move for a stay of the district court proceedings in view of the instituted IPRs. In order to comply with the local rules, can you please let us know your availability Mon-Wed next week for a short meet-and-confer where you can inform us of Plaintiff's position.

Regards,

Jeff

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