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February 3, 2025

Hon. Kenneth M. Karas
United States District Judge for the Southern District of New York
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601

Re: *Carvana, LLC v. IBM Corp.*, Civ. No. 7:23-cv-08616-KMK-VR (S.D.N.Y.)
Notice of Petition Seeking *Inter Partes* Review Filed with the Patent Trial and
Appeal Board of the U.S. Patent & Trademark Office

Dear Judge Karas:

We represent Plaintiff Carvana LLC (“Carvana”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Practice Rule I.A, we respectfully submit this letter on behalf of Carvana to inform the Court that on January 31, 2025, Carvana filed a petition with the Patent Trial and Appeal Board of the United States Patent and Trademark Office seeking *inter partes* review of patent-in-suit, U.S. Patent No. 7,702,719 (“IPR2025-00564”). Defendant IBM Corporation (“IBM”) was served with this petition on January 31, 2025.

We are conferring with IBM about Carvana’s forthcoming motion to stay this case pending resolution of IPR2025-00564.

Respectfully Submitted,

/s/ Wendy R. Stein