

From: [Kendrick, R. Tyler \(Perkins Coie\)](#)
To: [Connor Houghton](#)
Cc: [Burns, Helena \(Perkins Coie\)](#); [Matthew Berkowitz](#); [Aaron Morris](#); [Ariane Mann](#); [Patrick Colsher](#); efindlay@findlaycraft.com; [RJ_Valtrus-Data Center](#)
Subject: RE: Valtrus/Equinix - Follow up on Meet and Confer
Date: Friday, August 22, 2025 7:01:54 PM

CAUTION: EXTERNAL SENDER

Thanks, Connor. Equinix will prepare its opposed motion for leave to amend. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Have a good weekend.

Thanks,

Tyler

R. Tyler Kendrick
COUNSEL

Perkins Coie

1301 Second Avenue Suite 4200
Seattle, WA 98101-3804
[+1.206.359.8375](tel:+12063598375)
RKendrick@perkinscoie.com
perkinscoie.com

From: Connor Houghton <choughton@reichmanjorgensen.com>
Sent: Friday, August 22, 2025 11:37 AM
To: Kendrick, R. Tyler (SEA) <RKendrick@perkinscoie.com>
Cc: Burns, Helena (AUS) <HBurns@perkinscoie.com>; Matthew Berkowitz <mberkowitz@reichmanjorgensen.com>; Aaron Morris <amorris@reichmanjorgensen.com>; Ariane Mann <amann@reichmanjorgensen.com>; Patrick Colsher <pcolsher@reichmanjorgensen.com>; efindlay@findlaycraft.com; [RJ_Valtrus-Data Center](#) <RJ_ValtrusDataCenter@reichmanjorgensen.com>
Subject: RE: Valtrus/Equinix - Follow up on Meet and Confer

Hi Tyler,

Thanks for the follow up. Responses to a few points below:

Invalidity Contentions: since Equinix is not willing to agree to our proposed compromise, we will oppose the motion for leave to amend.

[REDACTED]

[REDACTED]

[REDACTED]

We look forward to hearing back on the items you were following up on.

Thanks,
Connor

Connor S. Houghton
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP
1909 K Street, NW
Suite 800
Washington, D.C. 20006
(202) 894-7315

From: Kendrick, R. Tyler (Perkins Coie) <RKendrick@perkinscoie.com>
Sent: Friday, August 22, 2025 12:17 AM
To: Connor Houghton <choughton@reichmanjorgensen.com>
Cc: Burns, Helena (Perkins Coie) <HBurns@perkinscoie.com>; Matthew Berkowitz <mberkowitz@reichmanjorgensen.com>; Aaron Morris <amorris@reichmanjorgensen.com>; Ariane Mann <amann@reichmanjorgensen.com>; Patrick Colsher <pcolsher@reichmanjorgensen.com>; efindlay@findlaycraft.com; RJ_Valtrus-Data Center <RJ_ValtrusDataCenter@reichmanjorgensen.com>
Subject: Valtrus/Equinix - Follow up on Meet and Confer

CAUTION: EXTERNAL SENDER

Connor,

Thank you again for the productive discussion this morning. Below is a summary of the issues we discussed and the parties action items following our meet and confer.

1. Equinix's Motion for Leave to Amend Invalidity Contentions

1. Equinix is going to move to amend its invalidity contentions for the '967 patent to include the prior art cited by Google, Digital Realty and CyrusOne.
2. Valtrus would consider not opposing Equinix's motion if it is limited to 1-2 prior art charts but you were going to discuss internally to confirm.
3. Equinix's motion may not include all of the prior art charted by Google, Digital Realty and CyrusOne but it will be moving to include more than 2 prior art charts.
4. **Status:** Please confirm whether Valtrus is going to oppose Equinix's motion.

2. Valtrus's Discovery Issues

1. [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]