

From: Ryan Richardson
Sent: Tuesday, April 21, 2026 11:01 PM
To: Ryan Chowdhury
Cc: Jennifer Chagnon; David Haars; Wenhao Xiong; PTAB Account; Alex Yu; Indranil Sarkar; PTAB
Subject: Inbound; Karl Renner; Crena Pacheco; IPR07314-0053IP1
RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Follow Up Flag: Follow up
Flag Status: Completed

Ryan,

Thank you for providing the additional pages and for the additional clarification on Dolby's response to ROG 4.

Petitioner, however, continues to disagree with Patent Owner's position with respect to the relevance of any JDA between Dolby and Disney. While actual communications and coordination between Dolby and Disney are relevant factors to the RPI and privy analyses, they are not the only factors. Indeed, the Board also considers other factors such as the third party's opportunity to control or coordinate on an IPR (whether that opportunity was ever taken advantage of or not) and the benefit that the third party may derive from the IPR. Petitioner believes that any JDA between Dolby and Disney would also be relevant to at least these other factors.

Therefore, Petitioner intends to email the Board tomorrow morning requesting authorization for discovery of any JDA between Dolby and Disney, and will provide the above justification for this discovery. We will represent that Patent Owner opposes this request and will indicate Patent Owner's position above in our email.

Best,
Ryan

Ryan Richardson
Director
Sterne, Kessler, Goldstein & Fox P.L.L.C.
Email: rrichardson@sternekessler.com
Direct: 202.772.8729

Administrative Assistant: Leonard Adgerson
Direct: 202.772.8911 Main: 202.371.2600

On Apr 21, 2026 6:59 PM, Ryan Chowdhury wrote:

EXTERNAL EMAIL: Use caution before

links or attachments.

Ryan,

Below are Petitioner's responses to Patent Owner's Requests for Clarification:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Re: Patent Owner's refusal to produce any JDA in response to RFP 1, we believe that the issues here can easily be resolved if no JDA between Dolby and Disney exists. If this is the case, please let us know. Otherwise, in the event that such a JDA does exist, it's important to distinguish between the JDA itself and any communications exchanged pursuant to the JDA. At a baseline, we disagree that the general facts relating to the JDA itself are subject to the various privileges that Patent Owner identifies here. Indeed, the mere existence, date, parties, general scope/contents of the JDA are not subject to the identified privileges. *See e.g., U.S. v. Stepney*, 246 F.Supp.2d 1069 (2003); *United States v. Hsia*, 81 F. Supp. 2d 7 (D.D.C. 2000). Moreover, since Patent Owner has

Patent Owner's Request for Clarification No. 3 appears based on the premise that Petitioner's position on Request for Production No. 1 turns on the application of privilege. It does not. Consistent with Petitioner's prior response and its further response above to Patent Owner's Request for Clarification No. 1, and consistent with the clarifications Patent Owner provided in narrowing the scope of its discovery requests to documents and communications reflecting coordination between Dolby and Disney about specifically the '268 IPR or issues raised by the '268 IPR, there are no implicated communications or documents as to which any question of privilege could arise. Petitioner's position is that, because there are no implicated communications or documents responsive to Patent Owner's requests within the scope the parties agreed to, the existence of any joint defense agreement ("JDA") between Dolby and Disney is likewise outside the scope of Patent Owner's discovery requests.

From: Ryan Chowdhury
Sent: Friday, April 17, 2026 12:52 PM
To: Ryan Richardson ; Jennifer Chagnon ; David Haars ; Wenhao Xiong
Cc: PTAB Account ; Alex Yu ; Indranil Sarkar ; PTAB Inbound ; Karl Renner ; Crena Pacheco ; IPR07314-0053IP1
Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

EXTERNAL EMAIL: Use caution before clicking links or attachments.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ryan Chowdhury

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>
Sent: Thursday, April 16, 2026 5:50 PM
To: Ryan Chowdhury <rchowdhury@fr.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>
Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>
Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan,

Thank you for providing Patent Owner's responses and document production. Upon our initial review, there are three issues for which we are seeking clarification.

1. [REDACTED]

- [REDACTED]
3. Re: Patent Owner's refusal to produce any JDA in response to RFP 1, we believe that the issues here can easily be resolved if no JDA between Dolby and Disney exists. If this is the case, please let us know. Otherwise, in the event that such a JDA does exist, it's important to distinguish between the JDA itself and any communications exchanged pursuant to the JDA. At a baseline, we disagree that the general facts relating to the JDA itself are subject to the various privileges that Patent Owner identifies here. Indeed, the mere existence, date, parties, general scope/contents of the JDA are not subject to the identified privileges. See e.g., *U.S. v. Stepney*, 246 F.Supp.2d 1069 (2003); *United States v. Hsia*, 81 F. Supp. 2d 7 (D.D.C. 2000). Moreover, since Patent Owner has not confirmed the existence of a JDA between Dolby and Disney, Patent Owner has also not alleged that any contents of such a JDA constitute opinion work product. As to the issue of relevance, unless it is Patent Owner's position that any JDA between Dolby and Disney explicitly does not cover any documents or communications between the parties relating to any aspect of this IPR, then we maintain that any such a JDA would be relevant here. We therefore ask that Patent Owner reconsider its refusal to identify the existence of a JDA between Dolby and Disney, as well as its refusal to produce the JDA itself. Should Patent Owner take the position that the JDA includes protectable opinion work product, InterDigital is amenable to working with Patent Owner on acceptable redactions to the JDA. Please provide your position on InterDigital's requests relating to the JDA issue **by COB Monday**. Again, while our preference is to continue avoiding having to involve the Board here, if we cannot reach an agreement on this issue, we will reach out to the Board for authorization to request production of any JDA between Dolby and Disney, and any further guidance on this issue **on Tuesday morning**.

We look forward to receiving Patent Owner's clarification on these points. We are also available to discuss over the phone is helpful.

Best,

Ryan

Ryan Richardson
Director
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From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Wednesday, April 15, 2026 5:22 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1

<IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Counsel,

Below are Petitioner's responses to Patent Owner's discovery requests. Documents responsive to these discovery requests are being produced via the link below.

We agree to your suggestion to use the Board's default protective order to govern your discovery requests. The materials produced are confidential and sensitive, and Petitioner expects that they will be treated in accordance with the confidentiality protections set forth in the Board's default protective order.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sincerely,

Ryan

--

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RESPONSE TO INTERROGATORY NO. 3:

Petitioner has produced relevant indemnity agreements between Disney and Dolby in the document link above.

INTERROGATORY NO. 4:

Describe any and all communications and coordination between Petitioner and Disney with respect to Dolby's DJ Action, the InterDigital-Disney Litigation, Ex Parte Reexamination Control Nos. 90/015968 and 90/016017, and/or the instant IPR, including but not limited to the existence and detailed terms of any joint defense agreement between Dolby and Disney that include or implicate any of the foregoing.

RESPONSE TO INTERROGATORY NO. 4:

Patent Owner clarified that Interrogatory No. 4 (1) excludes information for unrelated matters that fall outside the scope of the '268 IPR, (2) that requests relating to communications and coordination between Dolby and Disney are limited to communications that specifically relate to the '268 IPR, and (3) that any coordination and communications concerning the '268 patent are included only to the extent that they are tied to the '268 IPR. Based on Patent Owner's clarifications, there was no communication or other coordination about specifically the '268 IPR between Dolby and Disney prior to or during the preparation or filing of the '268 IPR, including any decision to file, timing of filing, or identification of grounds advanced in the '268 IPR.

REQUEST FOR PRODUCTION NO. 1:

Produce any joint defense agreements between Disney and Dolby that relate to the current disputes between each entity, on the one hand, and with InterDigital on the other hand, including Dolby's DJ Action and the InterDigital-Disney Litigation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Petitioner objects to this Request to the extent it seeks information that is protected by the attorney-client privilege, the attorney work product doctrine, the common interest privilege, or any other applicable privilege.

As set forth in Petitioner's Response to Interrogatory No. 4, there was no communication or other coordination about specifically the '268 IPR between Dolby and Disney prior to or during the preparation or filing of the '268 IPR, including any decision to file, timing of filing, or identification of grounds advanced in the '268 IPR. Accordingly, to the extent that any joint defense agreements exist between Dolby and Disney, such agreements are not relevant to the issues within the scope of discovery agreed to by the parties in this proceeding.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ryan Chowdhury

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>

Sent: Monday, April 13, 2026 6:19 PM

To: Ryan Chowdhury <rchowdhury@fr.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan,

[REDACTED]

[REDACTED]

Best,

Ryan

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1101 K Street NW, 10th Floor, Washington, DC 20005

From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Monday, April 13, 2026 4:37 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan,

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Sincerely,
Ryan

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From: Ryan Chowdhury <rchowdhury@fr.com>
Sent: Monday, April 13, 2026 12:17 PM
To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>
Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>
Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan – [REDACTED]

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>
Sent: Monday, April 13, 2026 12:11 PM
To: Ryan Chowdhury <rchowdhury@fr.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>
Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>
Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

[REDACTED]

Best,

Ryan

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From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Monday, April 13, 2026 1:37 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

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Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Ryan,

Thanks,

Ryan

Ryan Chowdhury

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>

Sent: Thursday, April 9, 2026 1:46 PM

To: Ryan Chowdhury <rchowdhury@fr.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan,

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Best,

Ryan

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From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Wednesday, April 8, 2026 4:06 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Ryan,

Thank you for the clarifications below. We appreciate the additional detail regarding the intended scope of the requests, which is helpful as we evaluate them.

[REDACTED]

[REDACTED]

Best,

Ryan

Ryan Chowdhury
Principal ■ Fish & Richardson P.C.

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Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Ryan,

Best,

Ryan

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From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Friday, April 3, 2026 5:37 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Counsel,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Sincerely,
Ryan

Ryan Chowdhury

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>

Sent: Thursday, April 2, 2026 6:23 AM

To: Ryan Chowdhury <rchowdhury@fr.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

Cc: PTAB Account <PTAB@sternekessler.com>; Alex Yu <yu@fr.com>; Indranil Sarkar <Sarkar@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Karl Renner <renner@fr.com>; Crena Pacheco <pacheco@fr.com>; IPR07314-0053IP1 <IPR07314-0053IP1@fr.com>

Subject: RE: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

Hi Ryan,

[REDACTED]

Best,

Ryan

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From: Ryan Chowdhury <rchowdhury@fr.com>

Sent: Wednesday, April 1, 2026 11:03 PM

To: Ryan Richardson <RRICHARDSON@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; David Haars <DHaars@sternekessler.com>; Wenhao Xiong <WXiong@sternekessler.com>

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Subject: Re: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

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Counsel,

[REDACTED]

Best,

Ryan

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From: Ryan Richardson <RRICHARDSON@sternekessler.com>

Date: Wednesday, April 1, 2026 at 9:08 AM

To: Alex Yu <yu@fr.com>, Crena Pacheco <pacheco@fr.com>, Indranil Sarkar <Sarkar@fr.com>, Karl Renner <renner@fr.com>, PTAB Inbound <PTABInbound@fr.com>, Ryan Chowdhury <rchowdhury@fr.com>

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Subject: IPR2026-00252 ('268 Patent) // Request for Additional Discovery related to RPI

[This email originated outside of F&R.]

Counsel,

Based on our review of public information, we believe that at least one unnamed party may be an additional real party in interest, and should have been identified as such in the Petition. For example, Dolby's declaratory judgment complaint filed in the Central District of California, in *Dolby Laboratories, Inc. et al. v. InterDigital, Inc. et al.*, No. 2:26-CV-02269-AH-AJR (C.D. Cal.) ("Dolby's DJ Action"), identifies The Walt Disney Company ("Disney"), among others, as a Dolby customer that uses Dolby Vision and against which InterDigital's patent(s) have been asserted. The DJ Action admits that "Dolby brings this case ... to protect its customers." ¶11. The complaint also indicates "Dolby will comply with existing contractual indemnity obligations to Disney." ¶25. These admissions suggest that at least Disney should have been listed as an additional RPI to the instant IPR proceeding.

Additional evidence suggesting that Disney should have been listed as an RPI here can be seen through Dolby and Disney's apparent coordinated effort to challenge the validity of select ones of the patents being asserted by InterDigital against Disney in *InterDigital, Inc. et al. v. The Walt Disney Company et al.*, No. 2:25-CV-00895-WLH-

BFM (C.D. Cal.) (“InterDigital-Disney Litigation”). Indeed, within the span of 18 days, Dolby filed the instant IPR and Disney filed two additional *ex parte* reexaminations (Control Nos. 90/015968 and 90/016017) challenging three non-overlapping patents from the InterDigital-Disney Litigation.

Importantly, Disney’s status as an unnamed RPI would implicate the time-bar under 35 U.S.C. § 315(b). The complaint in the InterDigital-Disney Litigation was served on February 7, 2025. This IPR was filed on February 9, 2026, the very last day of Disney’s one-year window to file an IPR. Pursuant to the Director’s informative decision in *Curium US LLC v. Universität Heidelberg*, IPR2025-01582, Paper 11 (Squires Feb. 25, 2026), if Dolby were to update its mandatory notices to include Disney as an RPI, a new filing date would be accorded to the Petition and the Petition would then be time-barred under § 315(b).

InterDigital, thus, seeks limited discovery from Dolby on this important issue. Good cause for this additional discovery exists at least because the Director has made clear that § 312(a), which requires *inter alia* “the petition identifies all real parties in interest,” “must be satisfied before the Director can institute trial.” 35 U.S.C. § 312(a)(2); USPTO Memorandum, “Precedential designation of *Corning Optical Communications RF, LLC v. PPC Broadband Inc.*, IPR2014-00440, Paper 68 (PTAB Aug. 18, 2015) (except for § II.E.1),” October 28, 2025. Dolby is in the best position to have documents and information relevant to this important issue.

[REDACTED]

Interrogatories:

[REDACTED]

[REDACTED]

[REDACTED]

4. Describe any and all communications and coordination between Petitioner and Disney with respect to Dolby’s DJ Action, the InterDigital-Disney Litigation, *Ex Parte* Reexamination Control Nos. 90/015968 and 90/016017, and/or the instant IPR, including but not limited to the existence and detailed terms of any joint defense agreement between Dolby and Disney that include or implicate any of the foregoing.

Documents:

1. Produce any joint defense agreements between Disney and Dolby that relate to the current disputes between each entity, on the one hand, and with InterDigital on the other hand, including Dolby’s DJ Action and the InterDigital-Disney Litigation.

[REDACTED]

[REDACTED]

[REDACTED]

We are amenable to using the Board’s default protective order to govern treatment of the discovery we seek. If a phone call would be helpful, we would be happy to schedule one this week.

We look forward to hearing from you.

Best,

Ryan

Ryan Richardson
Director
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