

From: [Kapu Kumar](#)
To: [Deb Miedema](#)
Cc: [Scott Pojunas](#); [angela](#)
Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Deb,

My apologies. US6871264 is the correct patent number, but the title in the table is incorrect. The correct title is "System And Method For Dynamic Processor Core And Cache Partitioning On Large-Scale Multithreaded, Multiprocessor Integrated Circuits". You will find the claim chart materials reflect the correct title and patent information.

Regards,

Kapu Kumar

Executive Vice President

Patent Platform Services, LLC

M: 908.304.4351

kapu.kumar@patentplatformservices.com

From: Deb Miedema <debriedema@google.com>
Date: Tuesday, November 16, 2021 at 12:10 PM
To: Kapu Kumar <kapu.kumar@patentplatformservices.com>
Cc: Scott Pojunas <spojunas@google.com>, angela <angela@keypatentinnovations.ie>
Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Kapu.

Thanks for sending this additional list. I do have a question, however -- [US6871264](#) is listed in your fourth row as having this title: "System and Method For Profiling Clients Within A System For Harvesting Community Knowledge," but that patent number *actually* has this title: "System and method for dynamic processor core and cache partitioning on large-scale multithreaded, multiprocessor integrated circuits."

There is a patent with the title you listed, but its number is [US9053458](#).

Could you please clarify which patent you intended to list?

Thanks,
Deb

On Mon, Nov 15, 2021 at 2:53 PM Kapu Kumar <kapu.kumar@patentplatformservices.com> wrote:

Hi Scott,

Please see the attached notice letter. You can find the claim charts for the patents listed in the folder [here](#).

If you have any questions, please feel free to contact me.

Regards,

Kapu Kumar

Executive Vice President

Patent Platform Services, LLC

M: [908.304.4351](tel:908.304.4351)

kapu.kumar@patentplatformservices.com

From: Scott Pojunas <spojunas@google.com>

Date: Friday, September 10, 2021 at 12:27 PM

To: Kapu Kumar <kapu.kumar@patentplatformservices.com>

Cc: Deb Miedema <debmedema@google.com>, Paul Riley
<paul.riley@patentplatformservices.com>, angela <angela@keypatentinnovations.ie>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Kapu,

Thank you, confirming receipt. We'll look forward to hearing from you as you get further along with the valuation model.

Best,

Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](tel:650.203.8914)
California Registered In-House Counsel | Licensed Only in Virginia

On Thu, Sep 9, 2021 at 1:35 PM Kapu Kumar <kapu.kumar@patentplatformservices.com> wrote:

Hi Scott,

As we have explained earlier, our analysis of the Valtrus portfolio continues. Attached is notice for additional patents we have identified as relevant to Google. We'll upload the claim charts for these patents by tomorrow to the Dropbox folder where the earlier charts were shared.

<https://www.dropbox.com/sh/3lye4bbtzg000q8/AAAVNC92jRAjOoiDjKcSnIzpa?dl=0>

Also, we continue to work on our valuation models and pricing for the Valtrus patents. I will be in contact when we are prepared for this conversation. In the meantime, please let us know if you have any questions relating to the claim chart materials or if a technical discussion/presentation of the materials would be helpful.

Regards,

Kapu Kumar

Executive Vice President

Patent Platform Services, LLC

M: [908.304.4351](tel:908.304.4351)

kapu.kumar@patentplatformservices.com

From: Scott Pojunas <spojunas@google.com>

Date: Thursday, August 5, 2021 at 5:02 PM

To: Kapu Kumar <kapu.kumar@patentplatformservices.com>

Cc: Deb Miedema <debmedema@google.com>, Paul Riley
<paul.riley@patentplatformservices.com>, angela <angela@keypatentinnovations.ie>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Kapu,

That plan sounds good to us. We'll look forward to hearing from you in a few weeks.

Best,

Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](tel:(650)203-8914)
California Registered In-House Counsel | Licensed Only in Virginia

On Thu, Aug 5, 2021 at 11:46 AM Kapu Kumar <kapu.kumar@patentplatformservices.com> wrote:

Hi Scott,

Thank you for your email. Nice to meet as well.

We are making good progress on our valuation models and should be able to provide guidance in a few weeks. How about if I reach out at that time and we can schedule a call to discuss?

Regards,

Kapu Kumar

Executive Vice President

Patent Platform Services, LLC

M: [908.304.4351](tel:908.304.4351)

kapu.kumar@patentplatformservices.com

From: Scott Pojunas <spojunas@google.com>

Date: Wednesday, August 4, 2021 at 3:20 PM

To: angela <angela@keypatentinnovations.ie>

Cc: Kapu Kumar <kapu.kumar@patentplatformservices.com>, Deb Miedema <debmedema@google.com>, Paul Riley <paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela -

Thank you for following up and nice to meet you, Kapu.

During our call in June, we'd discussed that Valtrus would provide guidance on price expectations before our in-depth discussions on the claim charts. This will help inform the scope of our remaining review and expedite our discussions.

Please let us know if you're available for a call to discuss or if Kapu could provide pricing guidance during our call.

Best,
Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | (650) 203-8914
California Registered In-House Counsel | Licensed Only in Virginia

On Wed, Aug 4, 2021 at 2:13 AM Angela Quinlan <angela@keypatentinnovations.ie> wrote:

Scott,

Following on from our call in June, have you had time to review the claim charts we shared with you?

Please allow me to introduce Kapu Kumar from Patent Platform Services. Kapu is helping me with these licensing discussions and will follow up to arrange a call to discuss the claim charts once you have reviewed them.

Best,

Angela

From: Scott Pojunas <spojunas@google.com>

Date: Wednesday 23 June 2021 at 22:32

To: Angela Quinlan <angela@keypatentinnovations.ie>

Cc: Deb Miedema <debmedema@google.com>, Paul Riley <paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Thanks Angela, we appreciate you and Paul meeting with us earlier today. Confirming receipt of the patent list.

Best,
Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](#)
California Registered In-House Counsel | Licensed Only in Virginia

On Wed, Jun 23, 2021 at 12:58 PM Angela Quinlan <angela@keypatentininnovations.ie> wrote:

Scott, Deb,

Thank you for meeting with us today. As discussed, I have attached the list of Valtrus patents.

I will be in touch again towards the end of July.

Best regards,

Angela

From: Scott Pojunas <spojunas@google.com>

Date: Friday 11 June 2021 at 18:29

To: Deb Miedema <debmedema@google.com>

Cc: Angela Quinlan <angela@keypatentininnovations.ie>, Paul Riley <paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Thank you, Angela. Looking forward to speaking with you on June 23.

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](#)
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On Fri, Jun 11, 2021 at 8:20 AM Deb Miedema <debmedema@google.com> wrote:

Nice to meet you too, Angela. Looking forward to our conversation on the 23rd.

Kind regards,
Deb

On Fri, Jun 11, 2021 at 6:14 AM Angela Quinlan <angela@keypatentinnovations.ie> wrote:

Thanks Scott, I have sent the invite.

Deb - nice to e-meet you, I will be sure to copy you on all future correspondence.

I look forward to speaking with you both on the 23rd June.

Angela

From: Scott Pojunas <spojunas@google.com>

Date: Friday 11 June 2021 at 02:08

To: Angela Quinlan <angela@keypatentinnovations.ie>

Cc: Paul Riley <paul.riley@patentplatformservices.com>, Deb Miedema <debmedema@google.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela,

Wednesday, June 23 at 12 p.m. Pacific would work for us. Would you like to send an invite for a Zoom meeting?

I've copied my colleague Deb, a Technical Advisor in our team. Deb will be joining our meetings going forward if you could please also include her.

Best,
Scott

Scott Pojunas | Global Patents Team | [Google](#) LLC | [\(650\) 203-8914](tel:6502038914)
California Registered In-House Counsel | Licensed Only in Virginia

On Thu, Jun 10, 2021 at 2:23 PM Angela Quinlan <angela@keypatentinnovations.ie> wrote:

Hi Scott,

We could do Wednesday 23rd or Wednesday 30th June at 9-10 am or 12-2pm PT – would any of those times work?

Best regards,

Angela

From: Scott Pojunas <spojunas@google.com>
Date: Wednesday 9 June 2021 at 22:29
To: Angela Quinlan <angela@keypatentinnovations.ie>
Cc: Paul Riley <paul.riley@patentplatformservices.com>
Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela,

Thank you for finalizing and signing the NDA. I've attached the countersigned version.

I believe you'd proposed a meeting to review Valtrus' portfolio and the representative claim charts with us. I'd like to pull in a colleague who will be supporting this deal. If you could let me know a few dates and times that are convenient in the next few weeks, I can get back to you with our availability.

Best,
Scott

Scott Pojunas | Global Patents Team | Google LLC | (650) 203-8914
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On Tue, Jun 8, 2021 at 12:37 PM Angela Quinlan
<angela@keypatentinnovations.ie> wrote:

Hi Scott,

Thanks for your mail. We also had a holiday weekend here so I was out of the office yesterday myself.

I have accepted your proposed changes, put it in final and signed. Please send me back a countersigned copy.

Best regards,

Angela

From: Scott Pojunas <spojunas@google.com>
Date: Friday 4 June 2021 at 19:52
To: Angela Quinlan <angela@keypatentinnovations.ie>
Cc: Paul Riley <paul.riley@patentplatformservices.com>
Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela,

Thanks for your updates to the NDA and patience with me getting back to you. I was out of the office for a few days.

I understand your position on these issues and appreciate your clarifications in the NDA. As you'll see in the attachment, I've accepted almost all of your changes. I did modify the definition of "Patent-Related Materials" to include any correspondence between the parties. Our goal is to have an open exchange of information, so it's important to Google that information we receive from Valtrus while the NDA is active will not be used for purposes of establishing willfulness.

Please let me know if this version is acceptable. I'd also be happy to have a call to discuss.

Best,
Scott

Scott Pojunas | Global Patents Team | Google LLC | (650) 203-8914
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On Fri, May 28, 2021 at 12:05 PM Angela Quinlan
<angela@keypatentinnovations.ie> wrote:

Hi Scott,

Thanks for your email and redline of the proposed NDA.

While we appreciate your striking of the inducement provision, we find the remaining language too broad and confusing. As Paul shared on our call, we are willing to agree not to use the information Google shares, and our discussions, as evidence of willful infringement or as a basis to request enhanced damages, should we end up in litigation down the road. The attached redline reflects this view.

Please let us know if this language is acceptable. If it would be useful to have another short call, let me know.

Best,

Angela

From: Scott Pojunas <spojunas@google.com>

Date: Thursday 27 May 2021 at 22:56

To: Angela Quinlan <angela@keypatentinnovations.ie>, Paul Riley
<paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela & Paul,

It was nice speaking with you earlier this week.

Following up on our call, I've updated the attached NDA and also attached a comparison relative to your prior version. As we discussed, I removed the reference to Google affiliates and updated section 9 to remove the provisions regarding inducement.

Please let me know if you have any questions or if it would help to discuss further.

Best,
Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](#)
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On Mon, May 24, 2021 at 2:44 PM Scott Pojunas <spojunas@google.com> wrote:

Perfect, thanks Angela. I look forward to speaking with you on Wednesday.

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](#)
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On Sat, May 22, 2021 at 8:54 AM Angela Quinlan
<angela@keypatentinnovations.ie> wrote:

Hi Scott,

Wednesday at 8:30 am works for us. I look forward to speaking with you then.

Best regards,

Angela

From: Scott Pojunas <spojunas@google.com>

Sent: Saturday, May 22, 2021 12:47 a.m.

To: Angela Quinlan

Cc: Paul Riley

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela,

I'm an attorney in the Patent Transactions Group at Google and will be taking over on these discussions for Jim Maccoun. I have your redlines to the NDA and would suggest setting up a call to discuss.

If that works for you, are you available at any of these times?

- Tuesday, 5/25 between 9 and 11 a.m. Pacific
- Wednesday, 5/26 at 8:30 a.m. or 1 p.m. Pacific

Best,
Scott

Scott Pojunas | Global Patents Team | [Google LLC](#) | [\(650\) 203-8914](#)
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----- Forwarded message -----

From: **Angela Quinlan** <angela@keypatentinnovations.ie>

Date: Mon, May 17, 2021 at 1:54 AM

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

To: Jim Maccoun <maccoun@google.com>

Thanks Jim, appreciate the update. We look forward to hearing from the next attorney.

Angela

From: Jim Maccoun <maccoun@google.com>

Date: Thursday 13 May 2021 at 21:46

To: Angela Quinlan <angela@keypatentinnovations.ie>

Cc: Paul Riley <paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Hi Angela,

It is likely that a Google attorney other

than I will be handling this. Once that determination is made, then discussions on the NDA can proceed. You can expect to hear back within a week or two.

Best,

Jim

On Thu, May 13, 2021 at 1:35 PM Angela Quinlan

<angela@keypatentinnovations.ie> wrote:

Dear Jim,

I am following up on my last email. Did you have any comments on our proposed edits to the NDA?

Also, attached is a letter identifying three additional patents infringed by Google, and the following is a link to a folder including claim charts for the patents referenced in my letters.

<https://www.dropbox.com/sh/3lye4bbtzg000q8/AAAVNC92jRAjOoiDjKcSnIzpa?dl=0>

Please let me know if you cannot access the documents via this link.

Regards,

Angela

From: Angela Quinlan <angela@keypatentinnovations.ie>

Date: Wednesday 5 May 2021 at 21:52

To: Jim Maccoun <maccoun@google.com>

Cc: Paul Riley <paul.riley@patentplatformservices.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Dear Jim,

Following on from our call earlier today, I have attached our red-line to your NDA.

Regards,

Angela

From: Angela Quinlan <angela@keypatentinnovations.ie>

Date: Tuesday 4 May 2021 at 19:40

To: Jim Maccoun <maccoun@google.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Dear Jim,

That works for me. I will send a Zoom invite.

Thanks,

Angela

From: Jim Maccoun <maccoun@google.com>

Date: Tuesday 4 May 2021 at 18:00

To: Angela Quinlan <angela@keypatentinnovations.ie>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Dear Angela,

Would tomorrow at 9:30 AM (Pacific Time) work for you?

Best,

Jim

On Tue, May 4, 2021 at 8:33 AM Angela Quinlan <angela@keypatentinnovations.ie> wrote:

Dear Jim:

Just following up on my email from last week. Are you available today or any other day this week for a call?

Thanks,

Angela

From: Angela Quinlan <angela@keypatentinnovations.ie>

Date: Thursday 29 April 2021 at 16:33

To: Jim Maccoun <maccoun@google.com>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Dear Jim:

Thanks for your email.

A call to discuss would be good, are you free Tuesday at 1pm PT (9pm Irish time)?

Best regards,

Angela

From: Jim Maccoun <maccoun@google.com>

Date: Wednesday 28 April 2021 at 22:16

To: Angela Quinlan <angela@keypatentinnovations.ie>

Subject: Re: Valtrus Innovations Limited / Google Case No. 00010400

Dear Ms. Quinlan,

Thank you for your email. Google believes that a non-disclosure agreement would be beneficial in facilitating communication.

We ask that you reconsider your willingness to enter into a non-disclosure agreement. If you would like to discuss the non-disclosure agreement, we could set up a phone call for next week.

Best,

Jim

Jim Maccoun
Patent Counsel
Google LLC

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On Wed, Apr 28, 2021 at 12:31 PM Angela Quinlan
<angela@keypatentinnovations.ie> wrote:

Dear Jim:

Thank you for your email.

While it may be beneficial at some point in our discussions to have an NDA in place, we do not believe it is necessary at this stage.

As a next step, I suggest that we send you claim charts which set forth our infringement analysis for each of the noticed patents, and set up an introductory call to answer any questions you may have about Valtrus and its portfolio.

Please let us know a few dates and times that work for you for such a call, and I can send a meeting invite.

Best regards,

Angela

Angela Quinlan
Managing Director
Key Patent Innovations, Ltd.
www.keypatentinnovations.ie
M: +353 87 917 1202
Error! Filename not specified.

From: Jim Maccoun <maccoun@google.com>
Date: Wednesday 28 April 2021 at 16:44
To: Angela Quinlan <angela@keypatentinnovations.ie>
Subject: Valtrus Innovations Limited / Google Case No. 00010400

Angela Quinlan
Managing Director
Valtrus Innovations Limited

Dear Ms. Quinlan,

Google has received your letter dated April 14, 2021.

In order to proceed to discussions,

Google proposes the attached non-disclosure agreement.

Feel free to let me know if you have any questions.

Best,

Jim

Jim Maccoun
Patent Counsel
Google LLC

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Jim Maccoun
Patent Counsel
Google LLC

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Jim Maccoun
Patent Counsel
Google LLC

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Jim Maccoun
Patent Counsel
Google LLC

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- Deb Miedema
- Technical Advisor/Competitive Intelligence Analyst, Global Patents Team
- [650.253.6420](tel:650.253.6420)
- debmiedema@google.com

My pronouns are she/her/hers.

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- Deb Miedema
- Technical Advisor/Competitive Intelligence Analyst, Global Patents Team
- 650.253.6420
- debmiedema@google.com

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