
RE: Gaea v. Meta: Exchange of Proposed Terms & Claim Elements

From Ewell, Clinton W. <CEwell@mofo.com>

Date Fri 9/25/2026 16:03

To Palani P. Rathinasamy <palani@foliolaw.com>; Gaea v. Meta <Gaea-meta@foliolaw.com>

Cc MoFo-Meta-Gaea <MoFo-Meta-Gaea@mofo.com>

[EXTERNAL] This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel,

Pursuant to the Court's scheduling order, Meta discloses the following proposed term for construction:

- "recording method for writing content to the storage media" (claims 1, 9, and 14 of the '023 Patent)

Best,
Clint

From: Ewell, Clinton W. <CEwell@mofo.com>

Sent: Thursday, September 24, 2026 9:38 AM

To: Palani P. Rathinasamy <palani@foliolaw.com>; MoFo-Meta-Gaea <MoFo-Meta-Gaea@mofo.com>; Gaea v. Meta <Gaea-meta@foliolaw.com>

Subject: RE: Gaea v. Meta: Exchange of Proposed Terms & Claim Elements

Hi Palani,

This works, thank you. And yes, we are generally available to confer the afternoon of September 29.

Best,
Clint

From: Palani P. Rathinasamy <palani@foliolaw.com>

Sent: Monday, September 21, 2026 9:04 AM

To: MoFo-Meta-Gaea <MoFo-Meta-Gaea@mofo.com>; Gaea v. Meta <Gaea-meta@foliolaw.com>

Subject: Gaea v. Meta: Exchange of Proposed Terms & Claim Elements

External Email

Counsel,

Per the Court's scheduling order, the exchange of proposed terms and claim elements is Friday, September 25th. Can we agree to a simultaneous exchange at 5pm CT?

Meta Platforms, Inc., et al. v. Gaea LLC

IPR2026-00425

Gaea LLC Exhibit 2008

Page 1 of 2

For the meet and confer with October 2nd deadline, is there a time on Tuesday, September 29th that works?

Regards,

F | L | G | Palani P. Rathinasamy
FOLIO LAW GROUP PLLC | Partner
(404) 432-0206

NOTICE: This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison Foerster's [Privacy Policy](#).