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**Subject:** Re: IPR2020-00660, 0661 & 0662

Honorable Board,

Patent Owner does not oppose Petitioner's request for a 10-page Reply limited to addressing the "Fintiv factors" outlined in *Apple Inc. v. Fintiv, Inc.* so long as Patent Owner is also allowed to file a 10-page Sur-reply to respond to arguments and evidence raised in Petitioner's Reply. Otherwise, Patent Owner opposes Petitioner's request for additional briefing.

Patent Owner is available for a call with the Board on the dates and times identified by Petitioner.

Razmig Messerian  
Quinn Emanuel Urquhart & Sullivan LLP  
Counsel for Patent Owner

On Jul 28, 2020 9:54 PM, "McKeown, Scott" <[Scott.McKeown@ropesgray.com](mailto:Scott.McKeown@ropesgray.com)> wrote:

[EXTERNAL EMAIL]

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Trials:

In view of the recent precedential designation in *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (March 20, 2020), and its relevance to Patent Owner's arguments in its Patent Owner's Preliminary Responses (POPRs) in IPR2020-00660, 00661 & 00662, Petitioners seek authorization from the assigned panel to file a 10-page Reply in each proceeding. The Replies will address the application of the new precedential "Fintiv factors" to these cases. As these factors were made precedential after each petition was filed, they could not have been addressed earlier. Petitioner proposes to file these Replies by **Friday August 7<sup>th</sup>**.

Petitioners have conferred with Patent Owner's counsel. Patent Owner inquired as to the willingness of Petitioner to make this request joint, where the Patent Owner would receive a 10 page Sur-Reply to petitioner's requested briefing. However, given the significant briefing

already provided on this topic from the Patent Owner in its POPRs, Petitioner could not agree to further briefing from petitioner on this topic.

To the extent a call with the assigned panel(s) is necessary, the parties are available this Thursday July 30<sup>th</sup>, or Friday July 31<sup>st</sup> from 11 am to 5pm EST.

Counsel for Dolby Laboratories Inc.

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