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**From:** Ron Daignault <rdaignault@daignaultiyer.com>  
**Sent:** Wednesday, October 20, 2021 11:47 AM  
**To:** Westin, Cameron W.; Chandran Iyer; jim@carmichaelip.com; schreiner@carmichaelip.com; mitch@carmichaelip.com; Stephanie Mandir; Cathy Pampinella; Jason Charkow  
**Cc:** Godfrey, Kristin; Williamson, Brett J.; Liang, Amy K.; Berg, Brad; Kevin Sprenger; Westin, Cameron W.  
**Subject:** Re: Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

[EXTERNAL MESSAGE]

Hi Cameron,

SITO does not object to Hulu submitting Mr. Adams's three deposition transcripts in each of the seven IPRs.

Best regards,  
Ron



Ronald M. Daignault  
Partner

Daignault Iyer LLP  
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**From:** Westin, Cameron W. <cwestin@omm.com>  
**Date:** Tuesday, October 19, 2021 at 3:14 PM  
**To:** Ron Daignault <rdaignault@daignaultiyer.com>, Chandran Iyer <cbiyer@daignaultiyer.com>, jim@carmichaelip.com <jim@carmichaelip.com>, schreiner@carmichaelip.com <schreiner@carmichaelip.com>, mitch@carmichaelip.com <mitch@carmichaelip.com>, Stephanie Mandir <smandir@daignaultiyer.com>, Cathy Pampinella <cpampinella@daignaultiyer.com>, Jason Charkow <jcharkow@daignaultiyer.com>  
**Cc:** Godfrey, Kristin <kgodfrey@omm.com>, Williamson, Brett J. <bwilliamson@omm.com>, Liang, Amy K. <aliang@omm.com>, Berg, Brad <bmborg@omm.com>, Kevin Sprenger <ksprenger@daignaultiyer.com>, Westin, Cameron W. <cwestin@omm.com>  
**Subject:** RE: Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

Ron,

Hulu intends to submit all three deposition transcripts of Mr. Adams in each of the seven IPR proceedings (to the extent relevant). Hulu anticipates that this will lead to much greater efficiency in questioning Mr. Adams tomorrow and on Friday since, as you know, there is significant overlap between his opinions in the various declarations (e.g., state of the art, definition of a POSITA, certain prior art references, etc.). Please let us know if SITO will object, so that we can question Mr. Adams appropriately.

Regards,  
Cameron

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**From:** Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Sent:** Monday, September 27, 2021 12:57 PM

**To:** Ron Daignault <[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)>; Chandran Iyer <[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)>; jim@carmichaelip.com; schreiner@carmichaelip.com; mitch@carmichaelip.com; Stephanie Mandir <[smandir@daignaultiyer.com](mailto:smandir@daignaultiyer.com)>; Cathy Pampinella <[cpampinella@daignaultiyer.com](mailto:cpampinella@daignaultiyer.com)>; Jason Charkow <[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)>

**Cc:** Godfrey, Kristin <[kgodfrey@omm.com](mailto:kgodfrey@omm.com)>; Williamson, Brett J. <[bwilliamson@omm.com](mailto:bwilliamson@omm.com)>; Liang, Amy K. <[aliang@omm.com](mailto:aliang@omm.com)>; Berg, Brad <[bmberg@omm.com](mailto:bmberg@omm.com)>; Kevin Sprenger <[ksprenger@daignaultiyer.com](mailto:ksprenger@daignaultiyer.com)>; Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Subject:** RE: Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

Thank you, Ron. These dates work for us.

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**From:** Ron Daignault <[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)>

**Sent:** Monday, September 27, 2021 9:59 AM

**To:** Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>; Chandran Iyer <[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)>; jim@carmichaelip.com; schreiner@carmichaelip.com; mitch@carmichaelip.com; Stephanie Mandir <[smandir@daignaultiyer.com](mailto:smandir@daignaultiyer.com)>; Cathy Pampinella <[cpampinella@daignaultiyer.com](mailto:cpampinella@daignaultiyer.com)>; Jason Charkow <[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)>

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**Subject:** Re: Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

[EXTERNAL MESSAGE]

Hi Cameron,

Dr. Adams is available on October 15<sup>th</sup> at 9:00 am MT for his deposition in connection with IPR Nos. 2021-00158, 2021-00206, and 2021-00219. He is available on October 20<sup>th</sup> at 9:00 am MT for his deposition in connection with IPR Nos. 2021-00265 and 2021-00308. And he is available on October 22<sup>nd</sup> at 9:00 am MT for his deposition in connection with IPR Nos. 2021-00298 and 2021-00304.

Best regards,  
Ron



Ronald M. Daignault  
Partner

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**From:** Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Date:** Friday, September 24, 2021 at 2:51 PM

**To:** Ron Daignault <[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)>, Chandran Iyer <[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)>, [jim@carmichaelip.com](mailto:jim@carmichaelip.com) <[jim@carmichaelip.com](mailto:jim@carmichaelip.com)>, [schreiner@carmichaelip.com](mailto:schreiner@carmichaelip.com) <[schreiner@carmichaelip.com](mailto:schreiner@carmichaelip.com)>, [mitch@carmichaelip.com](mailto:mitch@carmichaelip.com) <[mitch@carmichaelip.com](mailto:mitch@carmichaelip.com)>, Stephanie Mandir <[smandir@daignaultiyer.com](mailto:smandir@daignaultiyer.com)>, Cathy Pampinella <[cpampinella@daignaultiyer.com](mailto:cpampinella@daignaultiyer.com)>, Jason Charkow <[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)>

**Cc:** Godfrey, Kristin <[kgodfrey@omm.com](mailto:kgodfrey@omm.com)>, Williamson, Brett J. <[bwilliamson@omm.com](mailto:bwilliamson@omm.com)>, Liang, Amy K. <[aliang@omm.com](mailto:aliang@omm.com)>, Berg, Brad <[bmberg@omm.com](mailto:bmberg@omm.com)>, Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Subject:** RE: Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

Counsel,

I am following up on the below. Please let us know Dr. Adams' availability.

Regards,  
Cameron

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**From:** Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Sent:** Tuesday, September 21, 2021 12:46 PM

**To:** Ron Daignault <[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)>; Chandran Iyer <[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)>; [jim@carmichaelip.com](mailto:jim@carmichaelip.com); [schreiner@carmichaelip.com](mailto:schreiner@carmichaelip.com); [mitch@carmichaelip.com](mailto:mitch@carmichaelip.com); Stephanie Mandir <[smandir@daignaultiyer.com](mailto:smandir@daignaultiyer.com)>; Cathy Pampinella <[cpampinella@daignaultiyer.com](mailto:cpampinella@daignaultiyer.com)>; Jason Charkow <[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)>

**Cc:** Godfrey, Kristin <[kgodfrey@omm.com](mailto:kgodfrey@omm.com)>; Williamson, Brett J. <[bwilliamson@omm.com](mailto:bwilliamson@omm.com)>; Liang, Amy K. <[aliang@omm.com](mailto:aliang@omm.com)>; Berg, Brad <[bmberg@omm.com](mailto:bmberg@omm.com)>; Westin, Cameron W. <[cwestin@omm.com](mailto:cwestin@omm.com)>

**Subject:** Hulu-SITO: IPR Nos. 2021-00158, 2021-00206, and 2021-00219 - Depositions of Dr. Adams

Counsel,

Please provide Dr. Adams deposition availability during the week of October 13-15 for a deposition covering IPR Nos. 2021-00158, 2021-00206, and 2021-00219. Our expectation is that we should be able to cover Dr. Adams' testimony in all three of these proceedings in a single deposition, though we reserve the right to seek further time to cover all three proceedings if needed.

Please also provide Dr. Adams' availability during the week of October 19-22 for two depositions. Our expectation is that IPR Nos. 2021-00265 and 2021-00308 can be covered in a single deposition, and that IPR Nos. 2021-00298 and 2021-00304 can be covered in a separate deposition.

Regards,  
Cameron

**O'Melveny**

**Cameron W. Westin**

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