

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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UNIFIED PATENTS, LLC,  
Petitioner,

v.

VL COLLECTIVE IP LLC,  
Patent Owner

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IPR2022-01086  
Patent No. 8,605,794

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**PETITIONER'S NOTICE OF DEPOSITION  
FOR MICHAEL T. GOODRICH, Ph.D.  
UNDER 37 C.F.R. § 42.53**

Pursuant to 37 C.F.R. § 42.53, Petitioner Unified Patents, LLC, hereby provides notice that it will take the deposition of **Michael T. Goodrich, Ph.D.**, a witness of Patent Owner VL Collective IP LLC.

As agreed to by the parties, the deposition will take place on **June 14, 2023**, beginning at **12:00 a.m. ET / 9 a.m. PT / 11:00 a.m. CT**, and will continue until complete. The deposition will be conducted remotely using a videoconferencing platform through which the parties and the witness will access the deposition.

The deposition will take place before a Notary Public or other officer authorized by law to administer oaths, to be arranged for by counsel for Petitioner. The deposition will be recorded using stenographic means to enable the production of a written transcript of the deposition.

Dated: May 24, 2023

Respectfully submitted,

/Raghav Bajaj/  
Raghav Bajaj  
Lead Counsel for Petitioner  
Reg. No. 66,630

HAYNES AND BOONE, LLP  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing was served on the Patent Owner as detailed below:

*Date of service* May 24, 2023

*Manner of service* Electronic Mail to:  
[clehman@reichmanjorgensen.com](mailto:clehman@reichmanjorgensen.com);  
[mmatulewicz-crowley@reichmanjorgensen.com](mailto:mmatulewicz-crowley@reichmanjorgensen.com);  
[jcardenas-navia@reichmanjorgensen.com](mailto:jcardenas-navia@reichmanjorgensen.com);  
[RJ\\_VideoLabs-Netflix@reichmanjorgensen.com](mailto:RJ_VideoLabs-Netflix@reichmanjorgensen.com)

*Documents served* **PETITIONER'S NOTICE OF DEPOSITION FOR  
MICHAEL T. GOODRICH, Ph.D.**

*Persons Served* Christine E. Lehman  
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP  
1909 K Street, NW, Suite 800  
Washington, DC 20006

Jaime F. Cardenas-Navia (pro hac vice)  
Michael Matulewicz-Crowley  
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP  
400 Madison Avenue, Suite 14D  
New York, NY 10017

Respectfully submitted,

/Raghav Bajaj/  
Raghav Bajaj  
Lead Counsel for Petitioner  
Reg. No. 66,630