

From: [Jaime Cardenas-Navia](#)
To: [Bowser, Jonathan](#); [Trials](#)
Cc: [Bajaj, Raghav](#); [McCombs, David L.](#); [Jessica Marks](#); [Roshan Mansinghani](#); [Christine E. Lehman](#); [Michael Matulewicz-Crowley](#)
Subject: RE: IPR2022-01086
Date: Friday, August 25, 2023 2:54:05 PM
Attachments: [image001.png](#)

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Dear Board,

Following up on the below email, Patent Owner opposes Petitioner's motion to terminate the IPR at least because there are substantial estoppel effects at play. Patent Owner will be prepared to explain its opposition to the motion in any briefing or hearing that the Board orders.

Best,

Jaime Cardenas-Navia
Counsel for Patent Owner

Jaime F. Cardenas-Navia
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From: Bowser, Jonathan <Jonathan.Bowser@haynesboone.com>
Sent: Friday, August 25, 2023 2:24 PM
To: Trials <Trials@USPTO.GOV>
Cc: Bajaj, Raghav <Raghav.Bajaj@haynesboone.com>; McCombs, David L. <David.McCombs@haynesboone.com>; Jessica Marks <jessica@unifiedpatents.com>; Roshan Mansinghani <roshan@unifiedpatents.com>; Christine E. Lehman <clehman@reichmanjorgensen.com>; Jaime Cardenas-Navia <jcardenas-navia@reichmanjorgensen.com>; Michael Matulewicz-Crowley <mmatulewicz-crowley@reichmanjorgensen.com>
Subject: IPR2022-01086

[EXTERNAL]

Dear Honorable Board,

Petitioner respectfully requests authorization to file a motion to terminate this IPR proceeding under 37 C.F.R. 42.72 and 42.20(a). Petitioner seeks to terminate this IPR proceeding so that it can reallocate its resources in light of budget constraints. Patent Owner will not be prejudiced by termination of this IPR proceeding. Oral argument is scheduled for September 19, 2023. Thus, the

IPR2022-01086
Ex. 3001

Board has not issued a final decision on the challenged claims.

Petitioner has conferred with Patent Owner. Patent Owner opposes Petitioner's request to terminate this proceeding.

If the Board would like to discuss Petitioner's request with the parties by telephone, the parties are available for a call with the Board at the following times (all times ET):

Tuesday, August 29: 11 am to 12 pm, 1 to 2 pm

Wednesday, August 30: 4 to 5 pm

Thursday, August 31: 11 am to 1 pm, 2:30 to 3:30 pm

Respectfully submitted,
Jonathan Bowser
Counsel for Petitioner
Reg. No. 54,574

HAYNES BOONE

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