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Sent: Wednesday, February 7, 2024 11:22 PM
To: Trials
Cc: Ian Soule; TRCH0110IPR@brookskushman.com; TRCH0110IPR1@brookskushman.com; ehaug@haugpartners.com; rcolletti@haugpartners.com; PTAB-Porsche@haugpartners.com; Michael Specht; Jason Fitzsimmons; Daniel E. Yonan; PTAB Account
Subject: IPR2022-01586 - Request for Pre-Hearing Conference
Attachments: RE: IPR2022-01586 ('029 Patent) // Demonstrative Service Date & Pre-hearing Conference

EXTERNAL EMAIL: Use caution before clicking links or attachments.

Dear Board,

Patent Owner requests a pre-hearing conference with the panel to seek early resolution of Petitioner's motion to exclude (Paper 27).

Petitioner's motion to exclude concerns both of Patent Owner's expert declarations (Exs. 2001 and 2006), which are "central to the parties' dispute" regarding every technical issue in this proceeding. (See CTPG, 80.) Petitioner opposes the request, and their reasons for opposing are included in the attached correspondence.

Patent Owner understands that "[a] pre-hearing conference call will be held at either party's request and will generally occur no later than three business days prior to the oral hearing." (CTPG, 82.) Since the oral hearing is on 2/22, and 2/19 is a federal holiday, the parties are available:

Thursday, 2/15 from 10:30a-12p and 1-2p, and
Friday, 2/16 between 10a-12p

Respectfully Submitted,
Andy Turner
Counsel for Patent Owner

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