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Sent: Wednesday, April 06, 2016 4:00 PM
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Cc: Stockwell, Mitch; Kadaba, Wab; Olinger, Jonathan; Ansley, Sutton; Desai, Anish; Marando, Christopher; Garthe, Zac; Andersen, Timothy
Subject: IPR2015-00698 and IPR2015-00700: Request to Substitute Documents
Attachments: 27. Reply Brief (IPR2015-00698) (SEALED-CONFIDENTIAL)_Redacted.pdf; Exhibit 1014 (IPR2015-00698) Declaration of Julie Davis (PUBLIC-REDACTIONS)_Redacted.pdf; Exhibit 1014 (IPR2015-00698) Declaration of Julie Davis (SEALED-CONFIDENTIAL)_Redacted.pdf; 30. Reply Brief (IPR2015-00700) (PUBLIC-REDACTED)_Redacted.pdf; 31. Reply Brief (IPR2015-00700) (SEALED-CONFIDENTIAL)_Redacted.pdf; Exhibit 1014 - (IPR2015-00700) Second Declaration of Shawn Burke_Redacted.pdf; Exhibit 1016 (IPR2015-00700) Declaration of Julie Davis REDACTED (SEALED-CONFIDENTIAL).pdf

IPR2015-00698
Patent No. 8,092,345

IPR2015-00700
Patent No. 8,579,767

Dear Board:

We are counsel of record for petitioner in the above-identified proceedings. Petitioner and Patent Owner have met and conferred regarding a discovery dispute between the parties. In order to resolve that dispute, Petitioner has agreed to strike paragraphs 24-28 in Exhibit 1016 in IPR2015-00700; paragraph 36 in Exhibit 1014 in IPR2015-00700; and paragraphs 23-27 in Exhibit 1014 in IPR2015-00698. Petitioner has also agreed to strike those portions of its reply briefs in IPR2015-00700 and IPR2015-00698 that rely on the above paragraphs. Attached to this email are copies of the revised exhibits with the relevant paragraphs redacted.

Petitioner seeks permission to either substitute or expunge the above referenced exhibits and reply briefs and replace them with the revised documents attached to this email. Please let us know if Petitioner may proceed as requested, and if the Board has a preferred approach for accomplishing this. As noted, we have met and conferred with Patent Owner regarding this issue and the substitute exhibits/briefs, and Patent Owner does not object to Petitioner's request.

Respectfully submitted,

Brian E. Ferguson
Counsel of Record for Petitioner



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