

From: [Chen, George](#)
To: [Trials](#)
Cc: [Isaac Rabicoff](#); [Smith, Cory](#)
Subject: IPR No. 2020-00763: Request for conference call with the Board
Date: Tuesday, July 14, 2020 1:42:19 PM

Dear Ms. Johnson:

I write on behalf of Petitioner seeking a conference call with the Board in connection with IPR Case No. 2020-00763 to request permission for Petitioner to submit a brief reply to Patent Owner's Preliminary Response. Petitioner seeks a short reply paper in order to address certain issues that only arose, for the first time, in Patent Owner's Preliminary Response.

Patent Owner's first argument on pages 2-5 of its Preliminary Response introduces several misstatements regarding Chase being a real party-in-interest and privy. These misstatements, if not corrected, could be dispositive on the issue of whether Petitioner is time-barred under 35 U.S.C. § 315(b).

Accordingly, Petitioner seeks an opportunity to assist the Board by identifying and correcting these inaccurate statements. To avoid introducing additional argument into the record at this time, Petitioner requests permission to file a 3-page reply that identifies and corrects the misstatements in the relevant portions of the Preliminary Response.

Petitioner has met and conferred with Patent Owner regarding these issues, and the parties were unable to reach an agreement. The parties are available for a conference call with the Board during the following days/times:

Thursday, July 16, 2020 (12 noon – 2 pm ET)
Friday, July 16, 2020 (12 noon- 2 pm ET)

Sincerely yours,

George Chen
Lead Counsel for Petitioner



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