

From: [Srikant Cheruvu](#)
To: [Jennifer B. Maisel](#); [Brian Rosenbloom](#); [Leonard Monfredo](#); [TD-PTAB](#); [Joel Glazer](#); [Jim Lennon](#); [DLF-Lit Paras](#)
Cc: [Steven Lieberman](#); [Sharon Davis](#); [Nicole M. DeAbrantes](#); [Kristen Logan](#); [Erik van Leeuwen](#)
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee
Date: Monday, January 31, 2022 12:43:42 PM

Jen,

As Leonard likely explained, Dr. Truong has not yet responded to Patent Owner's request seeking his availability for deposition. We agree to withdraw his declaration.

As for Mr. Lee, he understood that his declaration was being made with the expectation that he would be questioned about it during his upcoming examination in Korea. We are willing to stipulate to using in this proceeding all of the transcripts from the upcoming foreign inventor examinations in Korea, and agree to a reasonable extension of time of Petitioner's sur-reply. We note that the upcoming examinations in Korea put Petitioner at an equal, if not better, position than it would have been with being able to cross-examine Mr. Lee alone. For instance, it appears Petitioner already intends to question Mr. Lee and four other co-authors of the M20060 reference regarding the specific usedWith, equivalentTo, bitDepth, minBitDepth, and maxBitDepth attributes in the reference, which are the focus of Mr. Lee's declaration. If Petitioner now requires additional examination time for those aspects of his declaration, Patent Owner would be agreeable to that. There is thus no prejudice to Petitioner.

Accordingly, Patent Owner will oppose a motion to exclude Mr. Lee's declaration.

Thanks,
Srikant

From: Jennifer B. Maisel <jmaisel@rothwellfigg.com>
Sent: Monday, January 31, 2022 12:37 PM
To: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Srikant Cheruvu <scheruvu@devlinlawfirm.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
Cc: Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Following up on my email below. Will Patent Owner withdraw the Thang and Lee declarations?



Jennifer Maisel
Rothwell, Figg, Ernst & Manbeck, P.C.
607 14th Street, NW
Suite 800

VUDU EXHIBIT 1127
Vudu, LLC v. Ideahub, Inc.
Case IPR2020-01688

Washington, D.C. 20005

Main Number: 202.783.6040

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From: Jennifer B. Maisel

Sent: Friday, January 28, 2022 3:01 PM

To: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; 'Srikant Cheruvu' <scheruvu@devlinlawfirm.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>

Cc: Steven Lieberman <sieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>

Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Dear Srikant,

We understand from Leonard that Patent Owner's two declarants have not yet agreed to participate in remote cross-examination depositions in the above-referenced IPR proceedings. If the declarants will not be made available for depositions, please confirm that Patent Owner will withdraw or agree to withdraw both declarations by no later than noon (ET) on Monday, January 31st in advance of the February 1st deadline for any motions to exclude.

Best regards,

Jen



Jennifer Maisel

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From: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>
Sent: Wednesday, January 26, 2022 4:04 PM
To: 'Srikant Cheruvu' <scheruvu@devlinlawfirm.com>; Jennifer B. Maisel <jmaisel@rothwellfigg.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
Cc: Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Thanks

From: Srikant Cheruvu <scheruvu@devlinlawfirm.com>
Sent: Wednesday, January 26, 2022 4:04 PM
To: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Jennifer B. Maisel <jmaisel@rothwellfigg.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
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Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Brian,

These stipulations are fine with Patent Owner.

Thanks,
Srikant

From: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>
Sent: Wednesday, January 26, 2022 10:27 AM
To: Srikant Cheruvu <scheruvu@devlinlawfirm.com>; Jennifer B. Maisel

<jmaisel@rothwellfigg.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
Cc: Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Thanks Srikant. Please provide your OK for us to file the attached required notices of the stipulation.

Brian

From: Srikant Cheruvu <scheruvu@devlinlawfirm.com>
Sent: Tuesday, January 25, 2022 8:09 PM
To: Jennifer B. Maisel <jmaisel@rothwellfigg.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
Cc: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Jen,

No objection.

From: Jennifer B. Maisel
Sent: Tuesday, January 25, 2022 6:12 PM
To: Srikant Cheruvu ; Leonard Monfredo ; TD-PTAB ; Joel Glazer ; Jim Lennon ; DLF-Lit Paras
Cc: Brian Rosenbloom ; Steven Lieberman ; Sharon Davis ; Nicole M. DeAbrantes ; Kristen Logan ; Erik van Leeuwen
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Dear Srikant,

In view of Petitioner's objections filed today, and because you have advised that you are actively working on scheduling the cross-examination depositions of Patent Owner's declarants, we propose

moving Due Date 5 (motion to exclude evidence) to Feb. 1 and adjusting the remaining deadlines on any such motion to exclude as necessary.

Please let us know if you object to moving Due Date 5.

Best regards,
Jen



Jennifer Maisel

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From: Jennifer B. Maisel
Sent: Monday, January 24, 2022 4:59 PM
To: 'Srikant Cheruvu' <scheruvu@devlinlawfirm.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dlflitparas@devlinlawfirm.com>
Cc: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>
Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Dear Srikant,

Thank you for the update. Once you have confirmed the witnesses' availability and provided us with proposed deposition dates, please advise as to your availability for a conference call with the Board pursuant to 37 CFR 42.53(e) regarding foreign-language depositions.

Additionally, under the procedures outlined in *Ariosa Diagnostics v. Isis Innovation Ltd.*, IPR2012-00022, Paper 55, (PTAB Aug. 7, 2013), please confirm that Patent Owner will be providing the first interpreter for both depositions, and provide us with the name, business address, business telephone number, and e-mail address of the interpreters that you intend to use.

Best regards,
Jen



Jennifer Maisel

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From: Srikant Cheruvu <scheruvu@devlinlawfirm.com>

Sent: Monday, January 24, 2022 11:18 AM

To: Jennifer B. Maisel <jmaisel@rothwellfigg.com>; Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dflitparas@devlinlawfirm.com>

Cc: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes

<NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>

Subject: RE: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Jen,

We are looking into these witnesses' availability for a remote deposition and expect to get back to you when we have those details. We are also informed that at least one of the witnesses, likely both, will require interpreters in Vietnamese and Korean respectively.

Thanks,
Srikant

From: Jennifer B. Maisel <jmaisel@rothwellfigg.com>

Sent: Friday, January 21, 2022 4:14 PM

To: Leonard Monfredo <lmonfredo@devlinlawfirm.com>; TD-PTAB <TD-PTAB@devlinlawfirm.com>; Joel Glazer <jglazer@devlinlawfirm.com>; Srikant Cheruvu <scheruvu@devlinlawfirm.com>; Jim Lennon <jlennon@devlinlawfirm.com>; DLF-Lit Paras <dflitparas@devlinlawfirm.com>

Cc: Brian Rosenbloom <Brosenbloom@rothwellfigg.com>; Steven Lieberman <slieberm@rothwellfigg.com>; Sharon Davis <sdavis@rothwellfigg.com>; Nicole M. DeAbrantes <NDeAbrantes@rothwellfigg.com>; Kristen Logan <KLogan@rothwellfigg.com>; Erik van Leeuwen <evanlee@rothwellfigg.com>

Subject: Vudu, LLC v. IdeaHub, Inc., IPR2020-1688 and -1689 Deposition Scheduling - Thang and Lee

Counsel,

Pursuant to the Scheduling Order issued in the above-referenced proceedings, please advise no later than close of business Monday, January 24, as to the availability of Patent Owner's declarants Truong Cong Thang and Jin Young Lee for remote depositions to be held on Tuesday and Wednesday of next week, January 25th and 26th. If these dates do not work, please offer dates later that week when they are available.

Pursuant to 37 C.F.R. 42.53(g), it is our understanding that you will make the arrangements for the remote depositions, including hiring a court reporter, and bear the associated costs for a regular transcript. We also request that the declarants testify in English since the declarations were submitted in English.

Best regards,
Jen



ROTHWELL FIGG
IP Professionals

Jennifer Maisel

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