

Park, Collin W.

From: Michael Shore <mshore@shorechan.com>
Sent: Tuesday, March 3, 2020 10:33 AM
To: Park, Collin W.
Subject: RE: LG's Requests Are Denied and No Oral Argument

[EXTERNAL EMAIL]

Collin,

Tell LG they can also expect to be added to the fraud case against Google once I get the discovery showing LG knowingly conspired with Google not to disclose the RPIs in the Google IPR. Your firm may be dragged into that as well depending on what you knew and LG withheld from PTAB when it joined. We are going to get every joint defense communication in the fraud case and every single document that was withheld from PTAB.

LG should have settled with CyWee when we made very reasonable offers, but now CyWee has 10+ years of amended claims that are bulletproof as to validity, and perhaps the original claims too after the appeals are all said and done. CyWee is going to make LG pay dearly for putting it to the expense and trouble.

When a patent has 11 years of life left on it, it's pretty risky to file an IPR because the patentee can always amend claims, and instead of having a case with 16 years of damages, but invalidity questionable at trial and on appeal, CyWee now has a case with 11 years of damages going forward and invalidity eliminated as an issue because the PTAB granted the amendments even under their incredibly lax standards for assessing validity.

When you have a patent that covers every cell phone LG sells in the US for the next 11 years, that is more than enough. Frankly, I should thank LG.

Thanks,

Michael

From: Michael Shore
Sent: Friday, February 28, 2020 2:43 PM
To: Collin.Park@morganlewis.com
Subject: FW: LG's Requests Are Denied and No Oral Argument

Better get ready for the district court case, buddy.

From: jay jaykesan.com <jay@jaykesan.com>
Sent: Friday, February 28, 2020 2:35 PM
To: Michael Shore <mshore@shorechan.com>; Ari Rafilson <arafilson@shorechan.com>; Will Ellerman <wellerman@shorechan.com>; Cecil Key <cecil@keyiplaw.com>
Subject: LG's Requests Are Denied and No Oral Argument

Hi, everyone,

The PTAB gave us what we wanted. Really good news!! Now, we have to get the amended claims, I think we are likely to. --Jay.