

Subject: RE: Sonos, Inc. v. Linkplay Technology Inc., C.A. 24-131-JNR (D. Del.) -- Dispute Regarding Sonos's Discovery Responses
Date: Wednesday, April 2, 2025 at 12:32:37 PM Central Daylight Time
From: Peter Kosloski
To: Andrew Russell, Rovner, Philip A.
CC: Karen Keller, Linkplay-Bayes, Mandy Song, Andrew Ramos, Michael Boyea, Cole Richter, Sean Sullivan, Moshos, Andrew M.
Attachments: image001.png

Very good – we'll get a scheduling order out shortly.

We would ask that letters of up to two pages in length as to each side's position on any pending issues be e-mailed by **tomorrow, 4/3, at 3:00 p.m.**

Thanks all,

Peter

From: Andrew Russell <arussell@shawkeller.com>
Sent: Wednesday, April 2, 2025 1:29 PM
To: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>; Rovner, Philip A. <provner@potteranderson.com>
Cc: Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>; Mandy Song <mandy.song@bayes.law>; Andrew Ramos <andrew.ramos@bayes.law>; Michael Boyea <boyea@ls3ip.com>; Cole Richter <richter@ls3ip.com>; Sean Sullivan <sullivan@ls3ip.com>; Moshos, Andrew M. <amoshos@potteranderson.com>
Subject: Re: Sonos, Inc. v. Linkplay Technology Inc., C.A. 24-131-JNR (D. Del.) -- Dispute Regarding Sonos's Discovery Responses

CAUTION - EXTERNAL:

Dear Mr. Kosloski,

Yes, we would like to please proceed with the hearing on Friday regarding our second issue, Linkplay's request that the Court extend the upcoming claim construction deadlines. As we informed Sonos this morning, Sonos's supplemental responses do not moot the request for an extension, given that Linkplay will need time to review Sonos's hundreds of pages of responses.

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From: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>
Date: Wednesday, April 2, 2025 at 12:46 PM
To: Rovner, Philip A. <provner@potteranderson.com>
Cc: Karen Keller <kkeller@shawkeller.com>, Linkplay-Bayes <linkplay-bayes@bayes.law>, Mandy Song <mandy.song@bayes.law>, Andrew Ramos <andrew.ramos@bayes.law>, Michael Boyea <boyea@ls3ip.com>, Cole Richter <richter@ls3ip.com>, Sean Sullivan <sullivan@ls3ip.com>, Andrew Russell <arussell@shawkeller.com>, Moshos, Andrew M. <amoshos@potteranderson.com>
Subject: RE: Sonos, Inc. v. Linkplay Technology Inc., C.A. 24-131-JNR (D. Del.) -- Dispute Regarding Sonos's Discovery Responses

Thank you for that information, Mr. Rovner.

As this was Linkplay's request in the first instance, I'll leave to it you, Mr. Russell, to let me know as soon as you are able whether you'd like to proceed with a conference on Friday afternoon, now that we've confirmed that everyone would be available then.

Thanks all,

Peter

From: Rovner, Philip A. <provner@potteranderson.com>
Sent: Wednesday, April 2, 2025 12:34 PM
To: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>
Cc: Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>; Mandy Song <mandy.song@bayes.law>; Andrew Ramos <andrew.ramos@bayes.law>; Michael Boyea <boyea@ls3ip.com>; Cole Richter <richter@ls3ip.com>; Sean Sullivan <sullivan@ls3ip.com>; Andrew E. Russell Esq. (<arussell@shawkeller.com>) <arussell@shawkeller.com>; Moshos, Andrew M. <amoshos@potteranderson.com>
Subject: RE: Sonos, Inc. v. Linkplay Technology Inc., C.A. 24-131-JNR (D. Del.) -- Dispute Regarding Sonos's Discovery Responses

CAUTION - EXTERNAL:

Dear Mr. Kosloski:

Sonos can be available on Friday, April 4 at 3:00 pm. However, last evening, Sonos served supplemental responses to Linkplay's Interrogatory Nos. 2 and 19. We believe these supplemental responses moot the need for a hearing on the issues Linkplay raised in its initial email request, including its request to extend the upcoming claim construction deadlines; at a minimum, it demonstrates that the parties were not at an impasse as to those interrogatories.

Very truly yours,

Philip Rovner

Philip A. Rovner | Partner

**Potter
Anderson**

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From: Andrew Russell <arussell@shawkeller.com>

Sent: Tuesday, April 1, 2025 3:22 PM

To: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>; Rovner, Philip A.

<provner@potteranderson.com>

Cc: Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>; Mandy Song <mandy.song@bayes.law>; Andrew Ramos <andrew.ramos@bayes.law>; Michael Boyea <boyea@ls3ip.com>; Cole Richter <richter@ls3ip.com>; Sean Sullivan <sullivan@ls3ip.com>

Subject: [EXT] Re: Sonos, Inc. v. Linkplay Technology Inc., C.A. 24-131-JNR (D. Del.) -- Dispute Regarding Sonos's Discovery Responses

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Dear Mr. Kosloski,

The two interrogatories at issue are numbers 2 and 19, which the parties discussed this morning and in previous correspondence. To my knowledge there is no disagreement that the parties are at an impasse. Linkplay is available at 3:00pm ET Friday for a hearing.

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From: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>

Date: Tuesday, April 1, 2025 at 2:30 PM

To: Rovner, Philip A. <provner@potteranderson.com>, Andrew Russell <arussell@shawkeller.com>

Cc: Karen Keller <kkeller@shawkeller.com>, Linkplay-Bayes <linkplay-bayes@bayes.law>, Mandy Song <mandy.song@bayes.law>, Andrew Ramos <andrew.ramos@bayes.law>, Michael Boyea <boyea@ls3ip.com>, Cole Richter <richter@ls3ip.com>, Sean Sullivan <sullivan@ls3ip.com>

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Based on this, we'll hold off scheduling anything until tomorrow morning.

Please get back to me then on whether the parties would like to proceed with a conference on Friday. If so, we would want position letters by Thursday.

Thanks all,

Peter

From: Rovner, Philip A. <provner@potteranderson.com>

Sent: Tuesday, April 1, 2025 2:27 PM

To: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>; Andrew Russell <arussell@shawkeller.com>

Cc: Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>; Mandy Song <mandy.song@bayes.law>; Andrew Ramos <andrew.ramos@bayes.law>; Michael Boyea <boyea@ls3ip.com>; Cole Richter <richter@ls3ip.com>; Sean Sullivan <sullivan@ls3ip.com>

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Dear Mr. Kosloski:

Regarding Linkplay's request for an order to compel, Sonos respectfully requests that Linkplay identify, by number, the specific interrogatories they contend are at issue. Merely claiming that "certain interrogatories" are in dispute does not put Sonos on notice as to the alleged deficiencies in its responses. Moreover, without more information, Sonos cannot even determine whether the parties have conferred to discuss Linkplay's position and/or whether the parties are actually at an impasse.

Very truly yours,

Philip Rovner

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From: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>

Sent: Tuesday, April 1, 2025 2:07 PM

To: Andrew Russell <arussell@shawkeller.com>

Cc: Rovner, Philip A. <provner@potteranderson.com>; Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>; Mandy Song <mandy.song@bayes.law>; Andrew Ramos <andrew.ramos@bayes.law>; Michael Boyea <boyea@ls3ip.com>; Cole Richter <richter@ls3ip.com>; Sean Sullivan <sullivan@ls3ip.com>

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Good Afternoon,

We are fine scheduling a video conferencing to address this matter. If everyone is available, **4/4 at 3:00 p.m.**, that would be our preferred time, and it has the benefit of tackling the dispute sooner rather than later.

If this works for both sides, we would then ask that each of you provide a two-page letter via e-mail, outlining your position on the issue in more detail.

Let me know what everyone thinks.

Thank you,

Peter Kosloski

Courtroom Deputy Clerk to United States District Judge J. Nicholas Ranjan

United States District Court for the Western District of Pennsylvania

Joseph F. Weis, Jr. U.S. Courthouse | 700 Grant St., Pittsburgh, PA 15219 | Courtroom 6C

Tel: (412) 208-7495 | Email: peter_kosloski@pawd.uscourts.gov

From: Andrew Russell <arussell@shawkeller.com>

Sent: Tuesday, April 1, 2025 1:39 PM

To: Peter Kosloski <peter_kosloski@pawd.uscourts.gov>

Cc: Philip A. Rovner - Potter Anderson & Corroon LLP (provner@potteranderson.com)

<provner@potteranderson.com>; Karen Keller <kkeller@shawkeller.com>; Linkplay-Bayes <linkplay-bayes@bayes.law>;

Mandy Song <mandy.song@bayes.law>; Andrew Ramos

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Sean Sullivan <sullivan@ls3ip.com>

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Dear Mr. Kosloski:

Pursuant to paragraph 4.f. of the Scheduling Order (D.I. 44), the Linkplay defendants write to request that the Court schedule a conference/argument to address the following disputes:

- Linkplay's request that the Court compel Sonos to fully respond to certain Linkplay interrogatories.
- Linkplay's request that the Court extend the upcoming claim construction deadlines, which begin April 4, pending Sonos' response to Linkplay's interrogatories.

Counsel for the parties have met and conferred but have been unable to resolve these issues.

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