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September 8, 2016

The Honorable Sue L. Robinson
United States District Court
844 North King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *Intellectual Ventures I LLC v. Ricoh Americas Corp., et al.*,
C.A. No. 13-474-SLR-SRF

Dear Judge Robinson:

In advance of the upcoming September 9, 2016 hearing, the parties write to advise the Court that, consistent with the Court's August 17, 2016 Order (D.I. 279), the parties do not plan to address Ricoh's motions for summary judgment of non-infringement. To avoid any confusion, however, the parties thought it would be helpful to advise the Court that there are claim construction issues presented in the briefing on Ricoh's non-infringement motions (D.I. 220, 248, 268) that the parties wish to present to the Court at the September 9th hearing because those issues are independent of issues addressed by the Court's August 17 Order and may need to be resolved by the Court before trial in any event. For the Court's convenience, the parties identify the following portions of that briefing track that relates to supplemental claim construction:

Claim Construction Issue	**Brief**	**Pages**
761 Patent: "rotation steps"	D.I. 220	1-7, 12-18
	D.I. 248	26-34
	D.I. 268	1-11
728 Patent: "feedback means"	D.I. 220	20-23, 25-31
	D.I. 248	20-26
	D.I. 268	11-15

In addition, the parties plan to address the claim construction issues raised in their separate supplemental claim construction briefing (D.I. 245, 253, 264, 283), their briefing on motions for summary judgment of no invalidity (D.I. 216, 261, 281) and marking (D.I. 220, 248, 268), and their *Daubert* motions (D.I. 214, 224, 256, 259, 280, 284).

IV seeks the Court's guidance about whether the Court's Order (D.I. 279) intended to include IV's motion for summary judgment of no non-infringing alternatives (*see* D.I. 192 and D.I. 193) in the "non-infringement" category or the "damages" category. The motion relates to both, and implicates the discovery dispute about missing documents, at least in part. IV will be prepared to make a presentation to the Court on its motion, but only if the Court decides to hear the issue

Respectfully,

/s/ *John G. Day*

John G. Day (#2403)

JGD/nml

cc: All Counsel of Record (via electronic mail)