

From: [Director Discretionary Decision](#)
To: [Visoso, Morgan](#); [Director Discretionary Decision](#)
Cc: [Hannah, James](#); [Price, Jeffrey H.](#); [Kastens, Kris](#); [Eng, Jeffrey](#); [Bonny, Christopher M.](#); [Davis, James L., Jr.](#); [Middleton, Alexander](#); [Samsung-Vasu-IPR-Ropes](#)
Subject: RE: IPR2025-00446, -00447, -00448, -00449, -00450 - Vasu's Request for Authorization to File a Sur-Reply
Date: Monday, July 7, 2025 9:21:57 AM

Patent Owner's request for additional briefing is denied.

From: Visoso, Morgan <morgan.visoso@hsfkramer.com>
Sent: Wednesday, July 2, 2025 9:43 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Hannah, James <james.hannah@hsfkramer.com>; Price, Jeffrey H. <jeffrey.price@hsfkramer.com>; Kastens, Kris <kris.kastens@hsfkramer.com>; Eng, Jeffrey <jeffrey.eng@hsfkramer.com>; Bonny, Christopher M. <Christopher.Bonny@ropesgray.com>; Davis, James L., Jr. <James.L.Davis@ropesgray.com>; Middleton, Alexander <Alexander.Middleton@ropesgray.com>; Samsung-Vasu-IPR-Ropes <Samsung-Vasu-IPR-Ropes@ropesgray.com>
Subject: IPR2025-00446, -00447, -00448, -00449, -00450 - Vasu's Request for Authorization to File a Sur-Reply

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Director Stewart,

Patent Owner, Vasu, seeks authorization to file a Reply to Petitioners' Opposition to Vasu's Request for Discretionary Denials in the abovementioned IPR proceedings. There is good cause for a Reply. Vasu has not had an opportunity to address arguments raised for the first time in Petitioners' Opposition concerning Vasu's infringement contentions. Petitioners also raised a new settled expectations argument in their Oppositions for IPR2025-00446 and -00447. Vasu intends to file new evidence in its Reply to address Petitioners' new arguments. The parties have conferred, and Petitioners oppose Vasu's request. However, to the extent additional briefing and/or evidence is permitted, Petitioners request the same opportunity to submit a sur-reply as well as evidence responsive to Patent Owner's reply and evidence.

To the extent that a conference call necessary, the parties are available Tuesday, July 8, from 11 am to 5 pm ET and Wednesday, July 9, from 12 pm to 5pm ET.

Kind regards,
Morgan Visoso (Reg. No. 83,610)

Morgan Visoso

IPR2025-00450
Ex. 3101

Associate

Herbert Smith Freehills Kramer (US) LLP

333 Twin Dolphin Drive, Suite 700, Redwood Shores, California 94065

T: +1 650 752 1750 M: +1 513 593 3434 F: +1 650 752 1800

morgan.visoso@hsfkramer.com

www.hsfkramer.com

Kramer Levin is now HSF Kramer

Global capability. One firm.

This message (including any attachment) is confidential and may be covered by legal professional privilege or include information that is legally protected. If you are not the intended recipient you must not disclose or use the information contained in it. If you have received this email in error please notify us immediately by return email or by calling our main switchboard on +1 212 715 9100 or +1 917 542 7600 (New York), +1 650 752 1700 (Silicon Valley) or +1 202 775 4500 (Washington, D.C.) and delete the email.

This message was not intended or written to be used, and it cannot be used by any taxpayer, for the purpose of avoiding penalties that may be imposed on the taxpayer under U.S. Federal tax law. Some of this material may constitute attorney advertising within the meaning of sections 1200.1 and 1200.6-8 of Title 22 of the New York Codes, Rules and Regulatory Advertising Regulations. The following statement is made in accordance with those rules: ATTORNEY ADVERTISING: PRIOR RESULTS DO NOT GUARANTEE A SIMILAR OUTCOME. Results depend upon a variety of factors unique to each representation.

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer. In New York, we practice through both Herbert Smith Freehills Kramer New York LLP, a limited liability partnership registered in England and Wales with registered number OC375072 and Herbert Smith Freehills Kramer (US) LLP, a registered limited liability partnership organized under the laws of the State of New York with an office at 1177 Avenue of the Americas, New York, NY 10036. In Washington, D.C. and California, we practice through Herbert Smith Freehills Kramer (US) LLP. We use the word partner of Herbert Smith Freehills Kramer New York LLP or of Herbert Smith Freehills Kramer (US) LLP to refer to a member of those entities, or an employee or consultant with equivalent standing and qualifications.

Further information is available on our website www.HSFKramer.com, including our privacy policy which describes how we handle personal information.