

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NVIDIA CORPORATION,
Petitioner,

v.

NEURAL AI, LLC,
Patent Owner.

Case IPR2025-00609
Patent RE48,438

PATENT OWNER'S WAIVER OF PRELIMINARY RESPONSE

Patent Owner Neural AI, LLC (“Neural AI” or “Patent Owner”) hereby notifies the Board, as a courtesy, that it will not file a preliminary response to the Petition (Paper 1). The previous two IPRs filed by Petitioner NVIDIA Corporation against Patent Owner, IPR2025-00606 and -00608, were discretionarily denied. Since the same operative facts resulting in those denials are present here, Patent Owner believes this Petition will similarly be discretionarily denied and, thus, no preliminary response is necessary. Nothing herein should be taken as any concession that the Petition satisfies the § 314(a) standard.

Respectfully submitted,

/ Kenneth J. Weatherwax /
Kenneth J. Weatherwax (Reg. No. 54,528)
Nathan Lowenstein, *pro hac vice*
Colette Woo, *pro hac vice*
LOWENSTEIN & WEATHERWAX LLP

Date: August 28, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S WAIVER OF PRELIMINARY RESPONSE

The names and addresses of the parties being served are as follows:

Brian M. Buroker	bburoker@gibsondunn.com
L. Kieran Kieckhefer	kkieckhefer@gibsondunn.com
Nathan Curtis	ncurtis@gibsondunn.com
Vivian Lu	vlu@gibsondunn.com

Respectfully submitted,

/ Abbie Neufeld /

Date: August 28, 2025