

EXHIBIT 3001

From: Christian Dorman <cdorman@McKoolSmith.com>

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To: Trials <Trials@USPTO.GOV>

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Subject: IPR2025-00614, -00616

IPR2025-00614, -00616

Dear Board,

On February 21, 2025, Kingston filed petitions for *inter partes* review in IPR2025-00614 and -00616. At the same time, Kingston filed motions for joinder with IPRs previously filed by Phison (IPR2025-00212 and IPR2025-00215).

Patent Owner intends to oppose Kingston's motions for joinder, and seeks clarification on the deadline for filings its oppositions. Patent Owner recognizes that 37 C.F.R. § 42.25 sets the "default filing time[]" for an opposition as one month after service of the motion. Under this Rule, Patent Owner's oppositions would be due March 21, 2025.

However, Kingston's motions for joinder were filed at an early stage: the Phison IPRs (IPR2025-00212 and IPR2025-00215) have not been instituted, and Kingston's IPRs (IPR2025-00614 and -00616) have not yet been accorded filing dates. Additionally, the parties have not yet conferred with the Panel and the parties from the Phison IPR proceedings, as required by the Trial Practice Guide. See November 2019 TPG, at 76.

Given this procedural posture, Patent Owner believes that filing oppositions by March 21 would be premature. Accordingly, Patent Owner respectfully requests to file its opposition motions concurrently with its Patent Owner Preliminary Responses in Kingston's IPRs.

Patent Owner conferred with Petitioner, and Petitioner provided the following statement:

"Kingston does not oppose."

The Parties can be available on March 14th, or the week of March 17th, if the Board desires a conference call.

Respectfully,
Christian Dorman
Counsel for Patent Owner Vervain, LLC

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