

From: [Director_PTABDecision_Review](#)
To: [Wayne Zou](#); [Fussell, Tripp](#); [FW-CLIENT-Pantech-OnePlus-Service](#); [OnePlus-Pantech-IPR](#)
Subject: RE: IPR2025-00637 - Request for Authorization to File A Short Supplemental Brief
Date: Wednesday, October 1, 2025 3:28:12 PM
Attachments: [image001.png](#)
[image002.png](#)

Counsel,

Petitioner's request for authorization to file a supplemental brief in support of its pending request for Director Review is denied. Petitioner may file the order from the parallel district court litigation as an exhibit to the above-identified proceeding.

Thank you.

From: Wayne Zou <wayne.zou@bayes.law>
Sent: Tuesday, September 30, 2025 2:46 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Fussell, Tripp <jfussell@mayerbrown.com>; FW-CLIENT-Pantech-OnePlus-Service <Pantech-OnePlus-Service@mayerbrown.com>; OnePlus-Pantech-IPR <OnePlus-Pantech-IPR@bayes.law>
Subject: IPR2025-00637 - Request for Authorization to File A Short Supplemental Brief

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

Dear Honorable Director,

Petitioner in IPR2025-00637 respectfully requests, for good cause, authorization to file a short supplemental brief in support of its pending Request for Director Review.

On September 29, 2025, the court of the pending parallel district litigation issued an Order adopting the joint stipulation to stay the case. *See Pantech Corp. v. OnePlus Tech. (Shenzhen) Co., Ltd.*, 5:24-cv-00038, Dkt. No. 112 (Sept. 29, 2025) (E.D. Tex.). This Order materially alters the posture of the parallel litigation and is directly relevant to issues raised in the Request for Director Review.

To ensure the Director has the benefit of a complete and accurate record, Petitioner respectfully seeks leave to submit a concise, one-page supplemental brief addressing the significance of the stay. Petitioner would not object to Patent Owner filing a response of equal length. This limited briefing will aid the Director's review while avoiding any undue burden.

Counsel for Patent Owner has been copied on this request. After conferring, Patent Owner opposed supplemental briefing "because the Director has already found that any FWD will come before a trial in this case." Patent Owner also stated "[t]o the extent Petitioner still plans to request additional briefing, Pantech's position is that Petitioner should request permission to file only the Order but that no additional briefing is necessary. If briefing is granted, however, Pantech requests responsive briefing of equal length."

IPR2025-00637
Ex. 3105

Respectfully submitted,
Zhiwei Zou,
Lead Counsel on behalf of Petitioner

Wayne Z. Zou, Ph.D.

Partner | Patent Attorney

Bayes PLLC | www.bayes.law

8260 Greensboro Drive, Suite 625 | McLean, VA 22102

O (703) 995-9887 | F (703) 821-8128 | wayne.zou@bayes.law



This e-mail message, including its attachments, is from a law firm and may contain privileged, confidential, or proprietary information or information otherwise exempt from disclosure. The message is intended only for person(s) addressed above. If you believe you have received this message in error, please advise the sender by return e-mail and delete all copies from your mailbox. Thank you.