

From: [Director Discretionary Decision](#)
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Subject: RE: IPR2025-00662, -00663, -00664 - Request for Reply to Petitioner's Discretionary Denial Brief
Date: Thursday, July 24, 2025 2:51:27 PM

Patent Owner is authorized to file a 3-page reply in IPR2025-00662, -00663 and -00664, due no later than Monday, July 28, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 3-page sur-reply reply, due no later than Thursday, July 31, 2025.

From: Raghav.Bajaj@lw.com <Raghav.Bajaj@lw.com>
Sent: Wednesday, July 23, 2025 5:30 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Charles.Sanders@lw.com; Lauren.Rosen@lw.com; jimglass@quinnemanuel.com; quincylu@quinnemanuel.com; ptab@quinnemanuel.com
Subject: IPR2025-00662, -00663, -00664 - Request for Reply to Petitioner's Discretionary Denial Brief

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Dear Acting Director Stewart,

Patent Owner Kolon Industries, Inc. requests authorization to file a Reply to Petitioner's Response to Patent Owner's Request for Discretionary Denial of Institution in the above-listed proceedings (Paper 9 in each proceeding).

Patent Owner submits that good cause exists to authorize a Reply because each of Petitioner's briefs addresses the judgment of the Korean High Court with respect to Korean Patent No. 1580352 (submitted as Exhibit 1049), and Patent Owner could not have anticipated Petitioner's arguments with respect to Exhibit 1049. Although Petitioner notes (in its position below) that the judgment was announced on June 12, 2025, that was two business days before Patent Owner's briefs were due, and Patent Owner did not receive the Korean decision itself, let alone any translation thereof, until after the filing of Patent Owner's briefs requesting discretionary denial on June 16, 2025.

Patent Owner respectfully requests a three-page Reply in each proceeding, and does not oppose authorization for Petitioner to be provided an equal-length Sur-Reply.

Patent Owner and Petitioner have conferred, and Petitioner has indicated its position is as follows:

Petitioner notes that Korean counsel for both parties attended the June 12, 2025 hearing

when the Korean court announced its invalidity judgment. Both parties were therefore aware of the court's judgment before PO's opening brief on discretionary denial was filed. PO's request thus fails to establish good cause. However, Petitioner defers to the Director on whether additional briefing on this issue would be helpful. Petitioner respectfully requests that should PO's request be granted that it be granted a surreply of like timing and length. PO does not oppose this request.

To the extent the Director would like to schedule a conference call, the parties will provide availability as requested.

Best regards,

Raghav Bajaj
Counsel for Patent Owner

Raghav Bajaj

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