

From: [PTAB AIA Conference Calls](#)
To: [Fred Qiu](#); [Chen, Joe](#); [Suh, Howard S.](#); [Miller, Ryan N.](#); ipdocket@foxrothschild.com; [Chris Ponder](#); [Alex Nie](#)
Cc: [Trials](#)
Subject: Conference Call: IPR2025-00685 - Request for Extension of Due Dates
Date: Wednesday, November 26, 2025 6:29:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, November 25, 2025 4:31 PM
To: Fred Qiu <FQiu@sheppardmullin.com>; Chen, Joe <joechen@foxrothschild.com>; Suh, Howard S. <HSuh@foxrothschild.com>; Miller, Ryan N. <RMiller@foxrothschild.com>; ipdocket@foxrothschild.com; Chris Ponder <CPonder@sheppardmullin.com>; Alex Nie <ANie@sheppardmullin.com>
Cc: Trials <Trials@USPTO.GOV>
Subject: RE: IPR2025-00685 - Request for Extension of Due Dates

Counsel,

A conference call has been scheduled for **Tuesday, December 2, 2025 at 10:00 a.m. ET.**

The dial in number is 540-566-5633 and the phone conference ID is 314 117 736.

Regards,

Tina Williams
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Fred Qiu <FQiu@sheppardmullin.com>
Sent: Tuesday, November 25, 2025 4:06 PM
To: Chen, Joe <joechen@foxrothschild.com>; Trials <Trials@USPTO.GOV>
Cc: Suh, Howard S. <HSuh@foxrothschild.com>; Miller, Ryan N. <RMiller@foxrothschild.com>; ipdocket@foxrothschild.com; Chris Ponder <CPonder@sheppardmullin.com>; Alex Nie <ANie@sheppardmullin.com>
Subject: RE: IPR2025-00685 - Request for Extension of Due Dates

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Dear Honorable Board,

Patent Owner does not oppose Petitioner's requested 16-day extension for its Reply.

Petitioner mischaracterizes the parties' communications. Patent Owner repeatedly sought Petitioner's position on Nov. 10, 13, 17, and 19. Petitioner refused to provide its position and waited to present it to the Board for the first instance.

Respectfully Submitted,

Fangzhou Qiu
Back-up Counsel for Patent Owner

From: Chen, Joe <joechen@foxrothschild.com>

Sent: Tuesday, November 25, 2025 10:24 AM

To: Trials@uspto.gov

Cc: Suh, Howard S. <HSuh@foxrothschild.com>; Miller, Ryan N. <RMiller@foxrothschild.com>; IPDocket <IPDocket@foxrothschild.com>; Fred Qiu <FQiu@sheppardmullin.com>; Chris Ponder <CPonder@sheppardmullin.com>; Alex Nie <ANie@sheppardmullin.com>

Subject: RE: IPR2025-00685 - Request for Extension of Due Dates

Dear Honorable Board,

Petitioner opposes Patent Owner's request and did not consent (or have the opportunity to consent) to Patent Owner's email, exposing the inadequacy of Patent Owner's conferral prior to sending it. While Petitioner recognizes the impropriety of arguing its position through email, Petitioner respectfully must respond to Patent Owner's unauthorized and unduly argumentative request email.

Patent Owner initially requested an extension of nearly one month, needlessly compressing the latter half of the trial schedule with no good cause justification. It now asks for two weeks extension, citing the need to schedule a deposition of Petitioner's expert and the impending holidays. However, Patent Owner does not mention that the deposition has already been scheduled for December 11, 2025. Patent Owner did not request Dr. Bournazos's deposition until November 18. Petitioner provided dates and received Patent Owner's acknowledgement of the scheduled December 11 date within 24 hours. Thus, any delay in the scheduling of the expert deposition is of Patent Owner's own making and does not provide good cause. Further, Patent Owners Response is due January 7, 2026, nearly one month later. Patent Owner has not shown good cause why 12 weeks is not sufficient time to draft and file its Response.

Should the Board be inclined to grant the requested extension, Due Date 2 should be set for 100 days following service of the Patent Owner response (to May 1, 2025), giving Petitioner the same amount of time to prepare its reply.

	Original Date	Proposed Extension
DUE DATE 1 Patent Owner's Response to the petition	Jan. 7, 2026	Jan. 21, 2026
DUE DATE 2 Petitioner's reply to Patent Owner's response to petition	Apr. 1, 2026	May 1, 2026
DUE DATE 3 Patent Owner's sur-reply to reply	May 13, 2026	June 13, 2026


To be clear, Petitioner believes all of these extensions are unnecessary and lack good cause. However, should Patent Owner's proposed schedule be adopted, Petitioner would be prejudiced by not being given equivalent time on its response. Contrary to Patent Owner's assertion, Petitioner explained the prejudice of Patent Owner's schedule directly via email, further demonstrating the inadequacy of the parties' conferral prior to Patent Owner sending its request.

Respectfully Submitted,

Joe Chen, Ph.D.
Associate

Fox Rothschild LLP

 Princeton

 (609) 844-3024

 joechen@foxrothschild.com

From: Fred Qiu <FQiu@sheppardmullin.com>

Sent: Tuesday, November 25, 2025 12:52 AM

To: Trials@uspto.gov

Cc: Chen, Joe <joechen@foxrothschild.com>; Suh, Howard S. <HSuh@foxrothschild.com>; Miller, Ryan N. <RMiller@foxrothschild.com>; IPDocket <IPDocket@foxrothschild.com>; Chris Ponder <CPonder@sheppardmullin.com>; Alex Nie <ANie@sheppardmullin.com>

Subject: [EXT] IPR2025-00685 - Request for Extension of Due Dates

Dear Honorable Board,

Patent Owner requests a conference call with the Board to request a two-week extension of Due Dates 1, 2, and 3 in the Scheduling Order on the above-referenced case, as shown below:

	Original Date	Proposed Extension
DUE DATE 1 Patent Owner's Response to the petition	Jan. 7, 2026	Jan. 21, 2026
DUE DATE 2 Petitioner's reply to Patent Owner's response to petition	Apr. 1, 2026	Apr. 15, 2026
DUE DATE 3 Patent Owner's sur-reply to reply	May 13, 2026	May 27, 2026

Good cause exists for granting this request under 37 C.F.R. § 42.5(c)(2) because Patent Owner's counsel needs additional time to take the deposition of Petitioner's expert and prepare the Patent Owner's Response in view of the upcoming holidays and accompanying travel and deadlines in other district court matters (which includes the close of fact discovery and numerous depositions expected to be noticed in December). Because Due Dates 1, 2, and 3 are extended by the same amount, the requested extension will not result in any prejudice, and Petitioner has not identified any prejudice. This is the first extension requested by any party and will not affect any other dates.

Patent Owner requested an extension of the deadlines on November 10, but Petitioner was unable to provide its position until November 24. Petitioner stated it opposes this request but, when inquired, did not provide any basis for the opposition.

The parties are available for a conference call with the Board at the following times:

- December 1, 2025, 10am – 2pm, 3pm – 4pm ET
- December 2, 2025, 10am – 10:30am, 3pm – 4pm, 5pm – 6pm ET

Respectfully Submitted,

Fangzhou Qiu
Back-up Counsel for Patent Owner
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