

From: [Director Discretionary Decision](#)
To: [Colin Heideman](#); [Director Discretionary Decision](#)
Cc: [2Cbh](#); [2jrr](#); [2Jaa](#); [2Crw](#); [2Ndr](#); [2Lpy](#); [2Dph](#); [BoxSEAZNL2185LP2](#); [BoxSEAZNL.2185LP5](#); [BoxSEAZNL.2185LP6](#); [BoxSEAZNL.2185LP4](#); [BoxSEAZNL2185LP3](#); [BoxSEAZNL2185LP](#); [sreynolds@daignaultiyer.com](#); [Jennifer Chagnon](#); [Jason Fitzsimmons](#); [Michael Specht](#); [Nirav Desai](#); [Richard Bembem](#); [Xiaowei Jin](#); [ksprenger@daignaultiyer.com](#); [cbiyer@daignaultiyer.com](#); [ehadi@daignaultiyer.com](#); [lmeroueh@daignaultiyer.com](#); [PTAB Account](#); [DI-AudioPod@daignaultiyer.com](#)
Subject: RE: IPR2025-00757, -00765, -00768, -00769, -00774, -00777 // Request for Reply to Petitioner's Discretionary Denial Briefing
Date: Thursday, July 24, 2025 2:53:10 PM
Attachments: [image001.png](#)
[image002.png](#)

Patent Owner is authorized to file a 4-page reply in IPR2025-00757, -00765, -00768, -00769, -00774, and -00777, due no later than Monday, July 28, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 4-page sur-reply reply, due no later than Thursday, July 31, 2025.

From: Colin Heideman <Colin.Heideman@knobbe.com>
Sent: Wednesday, July 23, 2025 6:53 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: 2Cbh <2Cbh@knobbe.com>; 2jrr <2jrr@knobbe.com>; 2Jaa <2Jaa@knobbe.com>; 2Crw <2Crw@knobbe.com>; 2Ndr <2Ndr@knobbe.com>; 2Lpy <2Lpy@knobbe.com>; 2Dph <2Dph@knobbe.com>; BoxSEAZNL2185LP2 <BoxSEAZNL2185LP2@knobbe.com>; BoxSEAZNL.2185LP5 <BoxSEAZNL2185LP5@knobbe.com>; BoxSEAZNL.2185LP6 <BoxSEAZNL2185LP6@knobbe.com>; BoxSEAZNL.2185LP4 <BoxSEAZNL2185LP4@knobbe.com>; BoxSEAZNL2185LP3 <BoxSEAZNL2185LP3@knobbe.com>; BoxSEAZNL2185LP <BoxSEAZNL2185LP@knobbe.com>; sreynolds@daignaultiyer.com; Jennifer Chagnon <JChagnon@sternekessler.com>; Jason Fitzsimmons <JFITZSIMMONS@sternekessler.com>; Michael Specht <MSPECHT@sternekessler.com>; Nirav Desai <NDESAI@sternekessler.com>; Richard Bembem <RBEMBEN@sternekessler.com>; Xiaowei Jin <XJin@sternekessler.com>; ksprenger@daignaultiyer.com; cbiyer@daignaultiyer.com; ehadi@daignaultiyer.com; lmeroueh@daignaultiyer.com; PTAB Account <PTAB@sternekessler.com>; DI-AudioPod@daignaultiyer.com
Subject: RE: IPR2025-00757, -00765, -00768, -00769, -00774, -00777 // Request for Reply to Petitioner's Discretionary Denial Briefing

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Honorable Director,

Petitioners oppose Patent Owner's request for further discretionary denial briefing in the referenced proceedings. However, if the Director grants Patent Owner's request, then Petitioners respectfully request permission to file a 4-page sur-reply in each proceeding limited to the new discretionary denial arguments Patent Owner raises in its reply.

Best regards,

Colin Heideman
Counsel for Petitioners

Colin Heideman
Partner
206-405-2016 **Direct**

Knobbe Martens

From: Jennifer Chagnon <JChagnon@sternekessler.com>

Sent: Wednesday, July 23, 2025 1:44 PM

To: Director_Discretionary_Decision@USPTO.gov

Cc: 2Cbh <2Cbh@knobbe.com>; 2jrr <2jrr@knobbe.com>; 2Jaa <2Jaa@knobbe.com>; 2Crw <2Crw@knobbe.com>; 2Ndr <2Ndr@knobbe.com>; 2Lpy <2Lpy@knobbe.com>; 2Dph <2Dph@knobbe.com>; BoxSEAZNL2185LP2 <BoxSEAZNL2185LP2@knobbe.com>; BoxSEAZNL.2185LP5 <BoxSEAZNL2185LP5@knobbe.com>; BoxSEAZNL.2185LP6 <BoxSEAZNL2185LP6@knobbe.com>; BoxSEAZNL.2185LP4 <BoxSEAZNL2185LP4@knobbe.com>; BoxSEAZNL2185LP3 <BoxSEAZNL2185LP3@knobbe.com>; BoxSEAZNL2185LP <BoxSEAZNL2185LP@knobbe.com>; sreynolds@daignaultiyer.com; Jason Fitzsimmons <JFITZSIMMONS@sternekessler.com>; Michael Specht <MSPECHT@sternekessler.com>; Nirav Desai <NDESAI@sternekessler.com>; Richard Bembem <RBEMBEN@sternekessler.com>; Jennifer Chagnon <JChagnon@sternekessler.com>; Xiaowei Jin <XJin@sternekessler.com>; ksprenger@daignaultiyer.com; cbiyer@daignaultiyer.com; ehadi@daignaultiyer.com; Imeroueh@daignaultiyer.com; PTAB Account <PTAB@sternekessler.com>; DL-AudioPod@daignaultiyer.com

Subject: IPR2025-00757, -00765, -00768, -00769, -00774, -00777 // Request for Reply to Petitioner's Discretionary Denial Briefing

IPR2025-00757 // U.S. Patent No. 10,091,266

IPR2025-00765 // U.S. Patent No. 8,738,740

IPR2025-00768 // U.S. Patent No. 10,805,111

IPR2025-00769 // U.S. Patent No. 9,954,922

IPR2025-00774 // U.S. Patent No. 8,738,740

IPR2025-00777 // U.S. Patent No. 9,319,720

Honorable Director,

Patent Owner requests permission to file a short 4-page reply to Petitioner's Responses to Patent Owner's Brief on Discretionary Denial, in each of the referenced proceedings, in order to address the following:

1. Petitioner's characterization of the Board's decisions with respect to settled expectations of

the parties; and

2. The impact of recent discretionary denial decisions issued after the filing of Patent Owner's brief, including *Dabico Airport Solutions Inc. v. AXA Power APS*, IPR2025-00408, Paper 21 (PTAB June 18, 2025).

The parties conferred and Petitioner opposes this request.

Best regards,
Jennifer Chagnon
Counsel for Patent Owner



Jennifer Meyer Chagnon
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