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Subject: RE: IPR2025-00785 and IPR2025-00786
Date: Friday, August 1, 2025 11:29:14 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Authorization to file the exhibits is granted.

From: Daniel H. Golub <DGolub@vklaw.com>
Sent: Thursday, July 31, 2025 1:18 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
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Subject: IPR2025-00785 and IPR2025-00786

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Dear Honorable Director,

It has come to my attention that I misstated certain information in the Brief In Support Of Patent Owner's Request For Discretionary Denial in IPR2025-00785 (Paper #6) and the Brief In Support Of Patent Owner's Request For Discretionary Denial in IPR2025-00786 (Paper #7), both submitted on July 9, 2025.

First, both briefs erroneously stated that the Markman Hearing and Trial Date in parallel district court litigation involving Petitioner Southwest Airlines (case no. 7:24-cv-277) were July 29, 2025 and July 27, 2026, respectively. However, a few days before the Discretionary Denial Briefs were filed (and unknown to me at the time), the parties had agreed to a revised schedule changing the Markman Hearing and Trial Date to December 8, 2025 and July 11, 2027, respectively.

Second, both briefs erroneously stated that no stay had been requested in the parallel district court litigation involving American Airlines (case no. 4:24-cv-980). In fact, on February 14, 2025, American Airlines had filed a request to stay certain claims on the basis of the customer-suit exception, which was subsequently denied by the court. I learned of this error this morning.

My errors were unintentional, and I apologize for misstating the information in question in the briefs I filed. In connection with correcting my errors, I respectfully request authorization to file as exhibits the updated scheduling order in the parallel litigation (reflecting the correct dates) and the order denying the stay request.

Respectfully,
Daniel H. Golub
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