

From: [Director Discretionary Decision](#)
To: [Waidelich, Sarah E.](#); [Argenti, Matthew](#); [Director Discretionary Decision](#)
Cc: [Barnett, Scott D.](#); [Thomas, David J.](#); [Saunders, Jenna E.](#); [Thomas, Tasha](#); [Rosato, Michael](#); [Mills, Jad](#)
Subject: RE: IPR2025-00950
Date: Monday, September 8, 2025 4:59:05 PM

Patent Owner is authorized to file a 3-page reply in IPR2025-00950 due no later than Wednesday, September 10, 2025, limited to addressing the arguments raised below.

From: Waidelich, Sarah E. <SWaidelich@honigman.com>
Sent: Monday, September 8, 2025 2:27 PM
To: Argenti, Matthew <margenti@wsgr.com>; Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Barnett, Scott D. <SBarnett@honigman.com>; Thomas, David J. <DThomas@honigman.com>; Saunders, Jenna E. <JSaunders@honigman.com>; Thomas, Tasha <tthomas@wsgr.com>; Rosato, Michael <mrosato@wsgr.com>; Mills, Jad <jmills@wsgr.com>
Subject: RE: IPR2025-00950

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 objects to Patent Owner's email below, which includes substantive legal arguments in a cover email that should be limited to seeking leave. Indeed, the Board has stated such emails "[s]hould **not** include substantive argument or attachments (e.g., draft motions)." USPTO, *Patent Trial and Appeal Board Boardside Chat: AIA Motions Practice*, March 18, 2021, at 7 (https://www.uspto.gov/sites/default/files/documents/ptab_boardside_chat_aia_motions_practice_20210318.pdf) (emphasis in original). Petitioner respectfully requests that the Honorable Director disregard the substantive arguments presented in Patent Owner's email.

There are numerous reasons why Petitioner maintains that a reply is not warranted, and why *Amazon Web Services* does not warrant discretionary denial on the facts of this case. But given the Board's stated preferences, Petitioner will not argue them here. Petitioner does note, however, that unlike Patent Owner's prior request for a reply in related proceedings PGR2025-00027 and PGR2025-00028, Patent Owner did not include the full text of Petitioner's statement in today's email. See *Alliance Laundry Systems, LLC v. PayRange LLC*, PGR2025-00027, Ex. 3101 (PTAB May 29, 2025); *Alliance Laundry Systems, LLC v. PayRange LLC*, PGR2025-00028, Ex. 3101 (PTAB May 29, 2025). For purposes of a complete record, Petitioner provides its complete statement below:

Petitioner opposes PayRange's request for a reply. If the Board nonetheless authorizes the reply, Petitioner reserves the right to seek authorization to file a sur-reply.

Regards,
Sarah E. Waidelich
Counsel for Petitioner Alliance Laundry Systems LLC

Sarah E. Waidelich

HONIGMAN LLP

O [734.418.4242](tel:734.418.4242)

swaidelich@honigman.com

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please delete it and notify the sender of the error.

From: Argenti, Matthew <margenti@wsgr.com>

Sent: Monday, September 8, 2025 1:45 PM

To: Director_Discretionary_Decision@USPTO.gov

Cc: Waidelich, Sarah E. <SWaidelich@honigman.com>; Barnett, Scott D. <SBarnett@honigman.com>; Thomas, David J. <DThomas@honigman.com>; Saunders, Jenna E. <JSaunders@honigman.com>; Thomas, Tasha <tthomas@wsgr.com>; Rosato, Michael <mrosato@wsgr.com>; Mills, Jad <jmills@wsgr.com>

Subject: IPR2025-00950

[EXTERNAL EMAIL]

Dear Honorable Director,

Patent Owner PayRange requests authorization to file a three-page reply to Petitioner's opposition to Patent Owner's request for discretionary denial in IPR2025-00950 (Paper 7, filed August 28, 2025). The reply will address Petitioner's arguments that the prior unsuccessful PGR and IPR challenges to the '608 patent do not warrant discretionary denial.

Good cause exists for a reply in light of the Director's recent decision in *Amazon Web Services, Inc. v. Croga Innovations, Ltd.*, IPR2025-00884, Paper 9 (Director Sept. 3, 2025). In the decision, the Director identifies the petitioner's argument that "its Petition 'addresses the precise deficiency identified by the Board in denying the earlier petitions'" challenging the same patent as "rais[ing] concerns of roadmapping and weigh[ing] in favor of discretionary denial." *Amazon Web Services*, IPR2025-00884, Paper 9, 2.

A nearly identical scenario exists here. In its opposition, Petitioner Alliance argues that its petition differs from the previous two post-grant proceedings challenging the '608 patent because "[w]hile the Board previously denied the PGR petition filed by KioSoft challenging the

'608 Patent based on invalidity grounds relying on Breitenbach, ***the present Petition addresses and cures any purported deficiencies with Breitenbach*** by relying on additional references Brown and Kaspar.” Paper 7, 36 (citing *KioSoft Techs., LLC v. PayRange Inc.*, PGR2021-00084, Paper 12) (emphasis added); see also *id.*, 4-5, 6-7, 13-14. Petitioner’s contention thus raises concerns of roadmapping and weighs in favor of discretionary denial. *Amazon Web Services*, IPR2025-00884, Paper 9, 2.

These concerns are not outweighed by Petitioner’s argument that three other proceedings involving other PayRange-owned patents have been referred by the Director. See, e.g., Paper 7, 8-9, 17-18. Those patents involve different claims encompassing different subject matter, and involve challenges applying different prior art.

Petitioner opposes Patent Owner’s request.

Respectfully,

Matthew A. Argenti

Counsel for Patent Owner PayRange LLC

Wilson Sonsini Goodrich & Rosati

650 Page Mill Rd., Palo Alto, CA 94304

Direct: (650) 354-4154

Fax: (650) 493-6811

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by others is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.