

**From:** [Director Discretionary Decision](#)  
**To:** [Lavenue, Lionel](#); [Director Discretionary Decision](#)  
**Cc:** [P52PTABDocket](#); [A8CPTABDocket](#); [CentralSquare-Carbyne-IPR](#)  
**Subject:** RE: IPR2025-00959 – Patent Owner Request for Discretionary Denial Reply (updated with cc listing)  
**Date:** Wednesday, September 24, 2025 1:02:01 PM  
**Attachments:** [image002.png](#)

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Patent Owner is authorized to file a 5-page reply in IPR2025-000959 due no later than Friday, September 26, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 5-page sur-reply due no later than Tuesday, September 30, 2025.

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**From:** Lavenue, Lionel <lionel.lavenue@finnegan.com>  
**Sent:** Wednesday, September 24, 2025 6:43 AM  
**To:** Director\_Discretionary\_Decision <Director\_Discretionary\_Decision@uspto.gov>  
**Cc:** P52PTABDocket <P52PTABDocket@orrick.com>; A8CPTABDocket <A8CPTABDocket@orrick.com>; CentralSquare-Carbyne-IPR <CentralSquare-Carbyne-IPR@finnegan.com>  
**Subject:** IPR2025-00959 – Patent Owner Request for Discretionary Denial Reply (updated with cc listing)

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Honorable Director,

My request below for leave to file a reply brief on discretionary denial did not include my cc listing, including counsel for Petitioner, which I have now added to this email, with regards.

Respectfully submitted,

Lionel

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**From:** Lavenue, Lionel  
**Sent:** Wednesday, September 24, 2025 6:06 PM  
**To:** [Director\\_Discretionary\\_Decision@USPTO.gov](mailto:Director_Discretionary_Decision@USPTO.gov)  
**Subject:** IPR2025-00959 – Patent Owner Request for Discretionary Denial Reply

Honorable Director,

I am lead counsel for Patent Owner Tritech Software Systems in the above-captioned IPR proceeding.

Patent Owner requests leave to file a reply to address three issues raised in Petitioner's

Discretionary Denial brief: (1) settled expectations, (2) Examiner error, and (3) public health issues. Patent Owner requests a 5-page brief, to be filed one week after the Board grants this request.

Petitioner opposes this request.

Respectfully submitted,

Lionel

**Lionel M. Lavenue** | [Bio](#)  
Attorney at Law

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FINNEGAN



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