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Subject: Imperative Care, Inc. v. Inari Medical, Inc., IPR2025-01021 (U.S. Pat. 11,969,333) - Request for Reply to POPR
Date: Thursday, October 2, 2025 7:32:33 PM

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Re: Imperative Care, Inc. v. Inari Medical, Inc., IPR2025-01021 (U.S. Pat. 11,969,333)

Dear PTAB Trials,

Petitioner requests leave to file a 10-page reply brief to Patent Owner's Preliminary Response ("POPR") pursuant to 37 CFR § 42.108(c) to respond to the arguments identified below. The parties have met and conferred, and Patent Owner opposes this request. Patent Owner's counsel is CC'd on this email.

Petitioner's reply will address the following issues in the POPR:

1. Patent Owner's arguments that Garrison's valve does not create vacuum in a clot cannister; and
2. Patent Owner's argument that Garrison's valve is incompatible with blood return;
3. Patent Owner's arguments that a POSITA would not have been motivated to use Garrison's valve with the aspiration systems in Laub or Aklog; and
4. The impact of the district court's September 29, 2025 Order Denying Motion for Preliminary Injunction in the related litigation *Inari Medical, Inc. v. Imperative Care, Inc.*, Case 5:24-cv-03117-EKL.

Petitioner contends good cause exists for a reply on these issues because the above arguments advanced in the POPR differ from Patent Owner's arguments for patentability presented during prosecution of the '333 patent, and therefore, Petitioner could not have reasonably anticipated them. Additionally, the Court only recently issued the Order Denying Motion for Preliminary Injunction on September 29, 2025.

Petitioner proposes to file the reply within one week of any order authorizing the reply.

If the Board would like to conduct a hearing to discuss this request, the parties are available at the following times for the requested conference call (all times eastern):

Tuesday, October 7 – 12:30 p.m.-3 p.m. (ET)
Thursday, October 9 – 12:30 p.m.-5 p.m. (ET)
Friday, October 10 – 12:30 p.m.-2:30 p.m. (ET)

If a hearing is held, Petitioner will supply a court reporter for the call.

Best Regards,
Joshua Stowell
Counsel for Petitioner Imperative Care, Inc.

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