

From: [Director Discretionary Decision](#)
To: [Colette Woo](#); [Director Discretionary Decision](#)
Cc: [Taeg Sang \(Tim\) Cho](#); [Lindsey Miller](#); [Laura Avena](#); [Kurt Fredrickson](#); [William Yau](#); [IBM-SFI-IPR-Service](#); [Nathan Lowenstein](#); [Kenneth Weatherwax](#); [Elliott, Stephen J.](#); [Iancu, Andrei](#); ["guziord@sullcrom.com"](#); [Sanders, Haley M.](#); [Gross, Alexander N.](#); [Halpern, Aviv S.](#); [Burke, Emma M.](#); [lushi@sullcrom.com](#); [devinem@sullcrom.com](#)
Subject: RE: IPR2025-01200, -01201, -01202 - Request for Authorization to File Replies
Date: Friday, October 24, 2025 5:05:25 PM

Patent Owner is authorized to file a 3-page reply in IPR2025-01200, -01201, and -01202 due no later than Monday, October 27, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 3-page sur-reply due no later than Thursday, October 30, 2025.

From: Colette Woo <woo@lowensteinweatherwax.com>
Sent: Friday, October 24, 2025 4:19 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Taeg Sang (Tim) Cho <tcho@desmaraisllp.com>; Lindsey Miller <LMiller@desmaraisllp.com>; Laura Avena <LAvena@desmaraisllp.com>; Kurt Fredrickson <KFredrickson@desmaraisllp.com>; William Yau <WYau@desmaraisllp.com>; IBM-SFI-IPR-Service <IBM-SFI-IPR-Service@desmaraisllp.com>; Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; Elliott, Stephen J. <elliotts@sullcrom.com>; Iancu, Andrei <iancua@sullcrom.com>; 'guziord@sullcrom.com' <guziord@sullcrom.com>; Sanders, Haley M. <sandersh@sullcrom.com>; Gross, Alexander N. <grossa@sullcrom.com>; Halpern, Aviv S. <halperna@sullcrom.com>; Burke, Emma M. <burkeem@sullcrom.com>; lushi@sullcrom.com; devinem@sullcrom.com
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Honorable Director,

Patent Owner Security First Innovations LLC respectfully requests authorization to file 3-page replies to Petitioner's Oppositions to Patent Owner's Requests for Discretionary Denial in the above-referenced cases. Petitioner does not oppose this request. Patent Owner is prepared to file the replies on Monday, October 27. Patent Owner does not oppose Petitioner filing sur-replies of equal length due five business days later (*i.e.*, November 3).

Each reply will address Petitioner's false assertion that SFC informed IBM "that SFC would not pursue any patent infringement action against IBM." Good cause exists because Patent Owner could not have foreseen this misrepresentation.

In the 1200 ('802) and 1201 ('194) cases, the respective replies will also address Petitioner's incorrect assertions that there was error during prosecution of those patents. Good cause exists because no such error exists, and no allegation of error was previously made in either case.

Counsel for Patent Owner has met and conferred with counsel for Petitioner. Petitioner disagrees with Patent Owner's characterization of Petitioner's opposition brief, but Petitioner does not oppose the request, provided that Petitioner is also permitted to file 3-page sur-replies.

If the Director deems a call necessary, the parties are available at the Director's convenience.

Respectfully submitted,

Colette Woo | Lowenstein & Weatherwax LLP
1016 Pico Blvd, Santa Monica, CA 90405
Office: 310.307.4500