

**From:** [Director Discretionary Decision](#)  
**To:** [Taeg Sang \(Tim\) Cho](#); [Trials](#); [Director Discretionary Decision](#)  
**Cc:** [Elliott, Stephen J.](#); [Kenneth Weatherwax](#); [Nathan Lowenstein](#); [Andrei Iancu](#); [Colette Woo](#); [IBM-SFI-IPR-Service](#)  
**Subject:** RE: Case Nos.: IPR2025-01200, -01201, -1202; Request for Authorization  
**Date:** Friday, August 15, 2025 10:35:55 AM

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Petitioner may file letters an exhibit.

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**From:** Taeg Sang (Tim) Cho <TCho@desmaraisllp.com>  
**Sent:** Thursday, August 14, 2025 5:23 PM  
**To:** Trials <Trials@USPTO.GOV>; Director\_Discretionary\_Decision <Director\_Discretionary\_Decision@uspto.gov>  
**Cc:** Elliott, Stephen J. <elliotts@sullcrom.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Andrei Iancu <iancua@sullcrom.com>; Colette Woo <woo@lowensteinweatherwax.com>; IBM-SFI-IPR-Service <IBM-SFI-IPR-Service@desmaraisllp.com>  
**Subject:** Case Nos.: IPR2025-01200, -01201, -1202; Request for Authorization

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Case Nos.: IPR2025-01200, -01201, -1202

Dear Honorable Board,

Petitioner International Business Machines Corporation (“IBM”) respectfully requests authorization to file, as an exhibit in each of the above-captioned proceedings, the *Sotera* stipulation made in connection with those proceedings.

More specifically, on August 13, 2025, Petitioner served notice letters on Patent Owner Security First Innovations (“SFI”), stating that Petitioner agrees to be bound by the *Sotera* stipulation in the District Court litigation related to the above-captioned IPR proceedings. Petitioner respectfully requests authorization to file those notice letters as an exhibit in the corresponding IPR proceeding.

Patent Owner SFI does not oppose the request. Should the Board require a conference call, the Parties are available at the Board’s convenience.

Taeg Sang Cho  
Counsel for Petitioner IBM

Taeg Sang (Tim) Cho | Partner

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