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Subject: IPR2025-01203, 01204, 01205, 01206, 01207, 01208, 01209, 01270; PGR2025-00067, 00068, 00069
Date: Tuesday, March 10, 2026 10:19:28 AM

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Dear Patent Trial and Appeal Board:

I represent Patent Owner XiFi Networks R&D, Inc. in the above-referenced IPRs and PGRs.

XiFi seeks a conference call with the Board to request permission to file a motion to terminate these IPRs pursuant to 37 CFR 42.72, to file a motion for director review out of time for good cause pursuant to 37 CFR 42.75, or to request relief through another vehicle at the Board’s direction on the basis provided in the precedential decision in *Revvo Techs., Inc. v. Cerebrum Sensor Techs, Inc.*, IPR2025-00632, Paper 20 (November 3, 2025). It is Patent Owner’s position that, post-institution of these IPRs and PGRs, Petitioners have advanced claim construction positions in district court that are different, and narrower, than what Petitioners have proposed in these IPRs and PGRs.

Patent Owner has conferred with Petitioners, who oppose this request.

Patent Owner and Petitioners further note that these related petitions have been assigned to three different panels of judges. Patent Owner’s request applies to all of the petitions, which may make scheduling difficult unless one panel can handle this issue for all. For the Board’s convenience we provide the breakdown of Judges as follows:

Before KEVIN C. TROCK, JOHN D. HAMANN, and MICHAEL T. CYGAN, Administrative Patent Judges	IPR2025-01203 IPR2025-01270 PGR2025-00067	IPR2025-01203 IPR2025-01204 IPR2025-01205 IPR2025-01206
Before WILLIAM V. SAINDON, JOHN D. HAMANN, and STEPHEN E. BELISLE, Administrative Patent Judges	IPR2025-01204 IPR2025-01205 PGR2025-00068 PGR2025-00069	IPR2025-01207 IPR2025-01208 IPR2025-01209 IPR2025-01270 PGR2025-00067
Before MICHELLE N. WORMMEESTER, JOHN D. HAMANN, and MICHAEL T.	IPR2025-01206 IPR2025-01207 IPR2025-01208	PGR2025-00068 PGR2025-00069 Ex. 3101

CYGAN, Administrative Patent
Judges.

IPR2025-01209

Patent Owner would also like to discuss with the Board whether it would make sense to consolidate the petitions in front of one panel, particularly in light of the overlap between these petitions which all address one family of patents.

Patent Owner Responses are due in the above proceedings on Tuesday, March 17. In order to ensure that Patent Owner addresses this issue through the appropriate vehicle, Patent Owners request a conference call prior to that date.

The parties are available for a call at the Board's convenience on Wednesday, March 11 from 2 EDT to 5 EDT or Thursday, March 12 from 12 to 12:30 EDT or 2:30-5 EDT.

Respectfully Submitted,
Cy Morton
Counsel for Patent Owner

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Cyrus is the modern version of the ancient Persian name "kurus" which means:

"humiliator of the enemy in verbal contest"

<https://iranicaonline.org/articles/cyrus-i-name>

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Thank you in advance for your cooperation.

Robins Kaplan LLP

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