

**From:** [Director Discretionary Decision](#)  
**To:** [Williams, Eliot D.](#); [Director Discretionary Decision](#); [Director DI](#)  
**Cc:** [nlagerwall@foley.com](#); [mhouston@foley.com](#); [Bhavsar, Samir](#); [Johnson, Jeffrey](#); [Agarwal, Pavan K.](#); [Xu, Chun](#); [Russ Chorush](#); [EXT Glick, Lily](#); [Michael Heim](#); [Chris Limbacher](#); [EXT Friesen, Kyle](#); [Liquori, Steve](#); [Trials](#)  
**Subject:** RE: TSMC v AICP, IPR2025-01210, -1211, -1212, and -01305  
**Date:** Thursday, November 6, 2025 2:15:28 PM

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Petitioner may file the revised Motion to Seal.

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**From:** Williams, Eliot D. <Eliot.Williams@BakerBotts.com>  
**Sent:** Wednesday, November 5, 2025 11:01 AM  
**To:** Director\_Discretionary\_Decision <Director\_Discretionary\_Decision@uspto.gov>; Director\_DI <Director\_DI@uspto.gov>  
**Cc:** [nlagerwall@foley.com](#); [mhouston@foley.com](#); [Bhavsar, Samir](#) <[samir.bhavsar@bakerbotts.com](#)>; [Johnson, Jeffrey](#) <[jeffrey.johnson@bakerbotts.com](#)>; [Agarwal, Pavan K.](#) <[PAgarwal@foley.com](#)>; [Xu, Chun](#) <[chun.xu@bakerbotts.com](#)>; [Russ Chorush](#) <[rchorush@hpcllp.com](#)>; [EXT Glick, Lily](#) <[lglick@hpcllp.com](#)>; [Michael Heim](#) <[mheim@hpcllp.com](#)>; [Chris Limbacher](#) <[climbacher@hpcllp.com](#)>; [EXT Friesen, Kyle](#) <[kfriesen@hpcllp.com](#)>; [Liquori, Steve](#) <[Steven.Liquori@BakerBotts.com](#)>; [Trials](#) <[Trials@USPTO.GOV](#)>  
**Subject:** RE: TSMC v AICP, IPR2025-01210, -1211, -1212, and -01305

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Dear Director Squires:

Petitioner's understanding is that Patent Owner (PO) still has a claim of confidentiality to a portion of the contents of PO's response to Petitioner's Request for the Production of Documents, which is an exhibit in each of the above-referenced proceedings. Accordingly, Petitioner intends to file a revised Motion to Seal directed solely to that Exhibit.

Respectfully,

Eliot D. Williams  
BAKER BOTTS LLP ■  
+1 202 639-1334 (Direct Dial)

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**From:** Director\_Discretionary\_Decision <[Director\\_Discretionary\\_Decision@uspto.gov](#)>  
**Sent:** Monday, November 3, 2025 8:19 AM  
**To:** Williams, Eliot D. <[Eliot.Williams@BakerBotts.com](#)>; Director\_Discretionary\_Decision <[Director\\_Discretionary\\_Decision@uspto.gov](#)>; Director\_DI <[Director\\_DI@uspto.gov](#)>  
**Cc:** [nlagerwall@foley.com](#); [mhouston@foley.com](#); [Bhavsar, Samir](#) <[samir.bhavsar@bakerbotts.com](#)>; [Johnson, Jeffrey](#) <[jeffrey.johnson@bakerbotts.com](#)>; [Agarwal,](#)

Pavan K. <[PAgarwal@foley.com](mailto:PAgarwal@foley.com)>; Xu, Chun <[chun.xu@bakerbotts.com](mailto:chun.xu@bakerbotts.com)>; Russ Chorush <[rchorush@hpcllp.com](mailto:rchorush@hpcllp.com)>; EXT Glick, Lily <[lglick@hpcllp.com](mailto:lglick@hpcllp.com)>; Michael Heim <[mheim@hpcllp.com](mailto:mheim@hpcllp.com)>; Chris Limbacher <[climbacher@hpcllp.com](mailto:climbacher@hpcllp.com)>; EXT Friesen, Kyle <[kfriesen@hpcllp.com](mailto:kfriesen@hpcllp.com)>; Liquori, Steve <[Steven.Liquori@BakerBotts.com](mailto:Steven.Liquori@BakerBotts.com)>; Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>

**Subject:** RE: TSMC v AICP, IPR2025-01210, -1211, -1212, and -01305

**[EXTERNAL EMAIL]**

Both the Motion to Seal and Petitioner's Opposition marked as "Board and Parties" will be expunged

Petitioner should file the corrected brief by COB today.

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**From:** Williams, Eliot D. <[Eliot.Williams@BakerBotts.com](mailto:Eliot.Williams@BakerBotts.com)>

**Sent:** Monday, November 3, 2025 5:31 AM

**To:** Director\_Discretionary\_Decision <[Director\\_Discretionary\\_Decision@uspto.gov](mailto:Director_Discretionary_Decision@uspto.gov)>; Director\_DI <[Director\\_DI@uspto.gov](mailto:Director_DI@uspto.gov)>

**Cc:** [nlagerwall@foley.com](mailto:nlagerwall@foley.com); [mhouston@foley.com](mailto:mhouston@foley.com); Bhavsar, Samir <[samir.bhavsar@bakerbotts.com](mailto:samir.bhavsar@bakerbotts.com)>; Johnson, Jeffrey <[jeffrey.johnson@bakerbotts.com](mailto:jeffrey.johnson@bakerbotts.com)>; Agarwal, Pavan K. <[PAgarwal@foley.com](mailto:PAgarwal@foley.com)>; Xu, Chun <[chun.xu@bakerbotts.com](mailto:chun.xu@bakerbotts.com)>; Russ Chorush <[rchorush@hpcllp.com](mailto:rchorush@hpcllp.com)>; EXT Glick, Lily <[lglick@hpcllp.com](mailto:lglick@hpcllp.com)>; Michael Heim <[mheim@hpcllp.com](mailto:mheim@hpcllp.com)>; Chris Limbacher <[climbacher@hpcllp.com](mailto:climbacher@hpcllp.com)>; EXT Friesen, Kyle <[kfriesen@hpcllp.com](mailto:kfriesen@hpcllp.com)>; Liquori, Steve <[Steven.Liquori@BakerBotts.com](mailto:Steven.Liquori@BakerBotts.com)>; Trials <[Trials@USPTO.GOV](mailto:Trials@USPTO.GOV)>

**Subject:** TSMC v AICP, IPR2025-01210, -1211, -1212, and -01305

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TSMC v AICP, IPR2025-01210, -1211, -1212, and -01305

Dear Director Squires:

The parties have met and conferred regarding the contents of Petitioner's Opposition to Patent Owner's Discretionary Denial Request, filed on October 28, 2025 in each of the above-referenced matters, and both parties have agreed that the opposition brief contains no Confidential Information and may be filed publicly. Accordingly, Petitioner in each matter withdraws the portion of its motion to seal directed to Petitioner's opposition brief in each of the above-referenced matters. Additionally, Petitioner requests permission to file a corrected version of the brief publicly in each proceeding that removes the confidentiality legend (with no other changes), and requests that the version of the brief that was previously filed with only "Parties and Board" availability be expunged after the corrected brief is filed in each proceeding.

Counsel for Patent Owner has informed us they do not object to this request.

Respectfully,

Eliot D. Williams

BAKER BOTTS LLP 

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