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To: [Patrick Keane](#); bboerman@sheridanross.com; rbrunelli@sheridanross.com; whelge@bdiplaw.com; jwilson@bdiplaw.com; [Andrew Koopman](#); [Samuel Harrod](#); [Amy Luttrell](#); [Roger Lee](#)
Cc: [Trials](#)
Subject: RE: IPR2025-01436, IPR2025-01437 – Petitioner's Request to File Reply to POPR
Date: Wednesday, January 14, 2026 4:25:34 PM
Attachments: [image001.png](#)

Counsel,

Petitioner is authorized to file a 3-page preliminary reply in IPR2025-01436 and -01437, due no later than January 20, 2026, limited to addressing the issues identified below. Patent Owner is authorized to file a 3-page preliminary sur-reply in each proceeding due no later than January 23, 2026, limited to addressing the same issues.

The parties should file their briefs as papers in P-TACTS.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

IPR2025-01436 and IPR2025-01437
Ex. 3001



From: Patrick Keane <patrick.keane@bipc.com>
Sent: Friday, January 9, 2026 3:06 PM
To: Trials <Trials@USPTO.GOV>
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Subject: IPR2025-01436, IPR2025-01437 – Petitioner's Request to File Reply to POPR

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Dear Board,

Petitioner requests permission to file a 5-page Reply to each of Patent Owner's Preliminary Responses (POPRs) in IPR2025-01436 and IPR2025-01437 regarding the following:

1. Patent Owner's assertion that Petitioner's position on claim construction requires denial.
2. Patent Owner's assertion that the motivation to combine set forth in the Petition involves hindsight bias.
3. Patent Owner's assertions concerning alleged deficiencies of the Grounds regarding select claim limitations.

The parties have met and conferred.

Counsel for Petitioner submits that this request for a Reply is timely, as such additional briefing will provide enhanced insight to issues relevant to institution.

Counsel for Patent Owner submits that this request is premature and should be denied without prejudice to resubmit after the Director decides whether to deny these cases or refer them to the merits panels. If Petitioner's request is granted, Patent Owner requests permission to file a 5-page sur-reply to Petitioner's reply.

Regards,

Patrick Keane
Counsel for Petitioner

Patrick C. Keane
Shareholder
1700 K Street
Suite 300
Washington, DC 20006

Buchanan

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