

**From:** [Trials](#)  
**To:** [Nicholas Stephens](#); [IPR50095-0260IP1](#); [IPR50095-0261IP1](#); [IPR50095-0264IP1](#); [Timothy Devlin](#); [Neil Benchell](#); [DLF- Lit Paras](#)  
**Cc:** [Trials](#)  
**Subject:** RE: IPR2025-01486, -01488, -01493 - Petitioner's Request for Replies to Patent Owner's Preliminary Responses  
**Date:** Thursday, January 29, 2026 8:41:18 AM  
**Attachments:** [image001.png](#)

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Counsel,

Petitioner is authorized to file a 3-page preliminary reply in each of IPR2025-01486, IPR2025-01488, and IPR2025-01493, due no later than February 3, 2026, limited to addressing claim constructions raised in the POPR. Patent Owner is authorized to file a 3-page preliminary sur-reply due no later than February 6, 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](mailto:andrew.kellogg@uspto.gov)  
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**From:** Nicholas Stephens <nstephens@fr.com>  
**Sent:** Friday, January 23, 2026 7:54 PM  
**To:** Director\_DI <Director\_DI@uspto.gov>  
**Cc:** IPR50095-0260IP1 <IPR50095-0260IP1@fr.com>; IPR50095-0261IP1 <IPR50095-0261IP1@fr.com>; IPR50095-0264IP1 <IPR50095-0264IP1@fr.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>; Neil Benchell <nbenchell@devlinlawfirm.com>; DLF- Lit Paras <dlflitparas@devlinlawfirm.com>  
**Subject:** IPR2025-01486, -01488, -01493 - Petitioner's Request for Replies to Patent Owner's Preliminary Responses

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IPR2025-01486  
IPR2025-01488  
IPR2025-01493  
Ex. 3102

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Honorable Director and Board,

Petitioner respectfully requests authorization to reply to Patent Owner’s Preliminary Responses (POPRs) in IPR2025-01486, IPR2025-01488, and IPR2025-01493. If authorized, the replies would address Patent Owner’s allegations that the petitions advance claim construction positions inconsistent with petitioner’s district court positions. The reply in IPR2025-01486 would additionally address Patent Owner’s arguments over the “subscriber” and “cellular core network” limitations, and the replies in IPR2025-01488 and IPR2025-01493 would address Patent Owner’s factual misstatements regarding the prior art’s instant messaging systems. Petitioner requests 5 pages for the reply in IPR2025-01486 and 3 pages for the replies in IPR2025-01488 and -01493.

Good cause exists for the replies because complete briefing on this issue would clarify the record by permitting argument from both parties. In addition, the POPRs cite claim construction briefing that was not submitted in district court until after the petitions were filed, and this would be petitioner’s first opportunity to respond both to this and recent developments through the *Markman* hearing this week in district court. If Petitioner’s request is authorized, Petitioner would not oppose sur-replies for Patent Owner of equal length to the authorized replies.

The parties have conferred and Patent Owner does not oppose the request. Should the Director desire a conference call, the parties can provide their mutual availability.

Respectfully,  
Nicholas Stephens

Counsel for Petitioner (Apple Inc.)

**Nicholas Stephens**  
Principal ■ Fish & Richardson P.C.

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