

From: [Trials](#)
To: [Jennifer Bailey](#); [Don Jackson](#); paul.hart@eriseip.com; justin.grimes@eriseip.com; [Erin Hadi](#); [Konah Duche](#); [Ron Daignault](#); [Richard C. Weinblatt](#); [Cliff Brazen](#); [Stephen McBride](#); [Richard Juang](#)
Cc: [Trials](#)
Subject: RE: IPR2025-00065, -00066, -00067 (TSMC, et al. v. MYW Semitech)
Date: Wednesday, March 11, 2026 4:06:56 PM
Attachments: [image001.png](#)

Counsel,

Petitioner is authorized to file a 4-page preliminary reply in each of IPR2026-00065, IPR2026-00066, and IPR2026-00067, due no later than March 16, 2026, limited to addressing the three points raised in Petitioner's email of 3/6/26, namely, Petitioner's claim construction consistency, Patent Owner's arguments regarding circumvention of the Petition's word limit, and Petitioner's obligation under 37 C.F.R. § 42.104(a). Patent Owner is authorized to file a 4-page preliminary sur-reply in each of these proceedings due no later than March 19, 2026, limited to addressing the same issues.

Additionally, Patent Owner is authorized to file a 3 page reply to Petitioner's Opposition to Discretionary Denial, and Petitioner is authorized to file a 3-page sur-reply in each proceeding. Patent Owner's reply is due no later than March 16 and Petitioner's sur-reply is due no later than March 19.

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

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
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IPR2026-00065
IPR2026-00066
IPR2026-00067
Ex. 3001

From: Jennifer Bailey <jennifer.bailey@eriseip.com>
Sent: Friday, March 6, 2026 6:05 PM
To: Director_DI <Director_DI@uspto.gov>
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Subject: IPR2025-00065, -00066, -00067 (TSMC, et al. v. MYW Semitech)

You don't often get email from jennifer.bailey@eriseip.com. [Learn why this is important](#)

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To the Director:

Petitioners and Patent Owner jointly request respective reply briefs to the recently-filed papers in the above-referenced IPRs.

Petitioners request a 4-page reply to Patent Owner's Preliminary Responses (Paper 12 in IPR2025-00065, -00066 and Paper 10 in IPR2025-00067) to address the following issues raised in each of the Preliminary Responses:

- The consistency between the Petition's claim construction for *semiconductor chip* and Apple's construction in the litigation and the inapplicability of *Revvo Techs.*;
- The Petitions' use of annotated figures and abbreviations is proper and does not amount to an improper attempt to circumvent the word count; and
- Clarification of Petitioners' obligation under, and compliance with, 37 CFR 42.104(a).

Patent Owner requests a 4-page reply to Petitioners' Opposition to Discretionary Denial (Paper 10 in IPR2025-00065, -00066 and Paper 11 in IPR2025-00067) to address the position that the Examiner did not err during prosecution.

If this joint request is granted, Petitioners and Patent Owner request that the deadline for their respective replies be set three business days from the Director's authorization.

Sur-Reply Briefs

Petitioners' Position: Petitioners do not believe either Party requires a sur-reply in this instance. However, if the Director authorizes Patent Owner to file a sur-reply to the Patent Owner Preliminary Response, Petitioners request that they be granted leave to file a sur-reply of equal length to Patent Owner's Request for Discretionary Denial.

Patent Owner's Position: If the Director authorizes Petitioners to file a reply to the Patent Owner's Preliminary Responses, Patent Owner requests that it be granted leave to file a sur-reply in each IPR of equal length to Petitioners' Reply to the POPRs. If the Director

authorizes Patent Owner to file a reply to Petitioners' Opposition to Discretionary Denial briefs, Patent Owner does not oppose Petitioners filing a sur-reply regarding this brief of equal length, if Petitioners choose to file one.

Sincerely,

Jennifer Bailey
Lead Counsel for Petitioners

Jennifer Bailey
shareholder

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