

From: [Director Discretionary Decision](#)
To: [Marcus Benavides](#); [Director Discretionary Decision](#); [Director DI](#)
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Subject: RE: Request for Authorization to File Reply to Opposition to PO Request for Discretionary Denial (IPR2026-00187 and IPR2026-00186)
Date: Wednesday, April 29, 2026 3:24:08 PM
Attachments: [image001.png](#)

The request is denied as moot.

From: Marcus Benavides <mbenavides@bosfirm.com>
Sent: Tuesday, April 28, 2026 10:41 AM
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Subject: Request for Authorization to File Reply to Opposition to PO Request for Discretionary Denial (IPR2026-00187 and IPR2026-00186)

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Dear Board members,

Patent Owner Golden Eye Technologies LLC respectfully requests leave to file **a seven-page reply** to Petitioner Cisco Systems, Inc.'s Oppositions to Patent Owner's Requests for Discretionary Denial (Paper 8) in each of IPR2026-00187 and IPR2026-00186, which challenge claims of U.S. Patent No. 9,717,037 (the "'037 patent") and U.S. Patent No. 10,051,556 (the "'556 patent"), respectively. Good cause exists because Petitioner's Oppositions introduce the following factual issues and legal theories that Patent Owner could not have reasonably anticipated when filing its Requests:

1. Petitioner's Oppositions introduce a newly alleged theory of "multiple material errors by the Examiner," which Petitioner alleges "weigh

strongly in favor institution.” While Petitioner in its initial Petition(s) noted that the background section of the ’037 and ’556 patent provide context for invalidity, the Oppositions now utilize this point—along with other newly alleged “internal inconsistencies in the prosecution record”—as a primary justification to override all other *Fintiv* factors. A reply is warranted to ensure the record accurately reflects the iterative prosecution history and the Examiner’s specific reasons for allowance.

2. Petitioner’s Oppositions also rely on the *Tianma Microelectronics Co. v. LG Display Co.* (March 18, 2026) to raise new issues regarding Patent Owner’s corporate structure and origin. Because *Tianma* was released *after* Patent Owner filed its Request, Patent Owner has had no opportunity to address this legal authority. Furthermore, while the Director’s Manufacturing Memorandum issued shortly (March 10, 2026) before Patent Owner’s Request (March 13), Petitioner’s Oppositions are the first instance where manufacturing-based arguments and supporting evidence (Exhibits 1013–1029) have been introduced in these proceedings. A reply is necessary to address this newly introduced factual and policy record.

Patent Owner is available for a teleconference at the Board’s convenience to discuss this request.

Sincerely,

Marcus Benavides
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