

From: [Trials](#)
To: [Saraswat, Anant K.](#); [Neil Rubin](#); [PTAB George Scott](#); [PTAB Anant Saraswat](#); [PTAB Turhan Sarwar](#); [Corbett, Gregory F.](#); [Rak Headwater](#); [Marc Fenster](#); [Dale Chang](#); [Jim Milkey](#)
Cc: [Trials](#)
Subject: RE: IPR2026-00203 (Google v. Headwater) – pre-institution reply
Date: Thursday, May 14, 2026 1:55:21 PM
Attachments: [image002.png](#)
[image003.png](#)

Counsel,

Petitioner is authorized to file a 2-page preliminary reply in IPR2026-00203, due no later than May 19, 2026, limited to addressing the claim construction issue Petitioner identifies in the email below. Patent Owner is authorized to file a 2-page preliminary sur-reply in IPR2026-00203 due no later than May 22, 2026, limited to addressing the same issue.

The parties should file their briefs as papers in P-TACTS. The parties are not authorized to file any evidence at this time.

Regards,

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



From: Saraswat, Anant K. <Anant.Saraswat@WolfGreenfield.com>
Sent: Thursday, May 7, 2026 12:57 PM
To: Trials <Trials@USPTO.GOV>; Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: PTAB George Scott <GScott-PTAB@WolfGreenfield.com>; PTAB Anant Saraswat <ASaraswat-PTAB@WolfGreenfield.com>; PTAB Turhan Sarwar <TSarwar-PTAB@wolfgreenfield.com>; Corbett, Gregory F. <Gregory.Corbett@WolfGreenfield.com>; Rak Headwater <rak_headwater@raklaw.com>; Marc Fenster <mfenster@raklaw.com>; Dale Chang <dchang@raklaw.com>; Neil Rubin <nrubin@raklaw.com>; Jim Milkey <jmilkey@raklaw.com>
Subject: IPR2026-00203 (Google v. Headwater) – pre-institution reply

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Dear Director and Honorable Board:

Petitioner respectfully requests authorization to file a 2-page reply to the POPR in IPR2026-00203. The POPR states that the Petition's references do not "disclose[] how a receiving application would be able to **decrypt** any encrypted data received from an application residing on the same device." POPR at p. 1 (emphasis original). This argument raises a claim construction issue – whether claim 1 includes a decryption requirement. Good cause exists to reply to the POPR to address this claim construction issue; the POPR's position was not foreseeable, as claim 1 does not recite "decrypt[ing]" data at all. Petitioner does not oppose Patent Owner being granted a 2-page surreply if Petitioner is granted a 2-page reply.

Patent Owner does not oppose Petitioner's request for a 2-page reply to address the above-discussed issue provided that Patent Owner is granted an equal-length surreply.

Should a conference call be deemed necessary, counsel for the parties are available at the following times (Eastern time):

Monday, May 11th: 11 AM-4 PM
Thursday, May 14th: 11AM-12 PM, 1 PM-4 PM

Respectfully submitted,
By counsel for Petitioner,



Anant Saraswat

He/Him/His
Shareholder

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