

From: [Director_PTABDecision_Review](#)
To: [Richard Crudo](#); [Lestin Kenton](#); [Dohm Chankong](#); [Ferraro, Vincent M.](#); [Bill Flanigen](#); [Nicholas Peters](#); [Ancora - IPR](#); [Trials](#); [Karen J. Wang](#)
Subject: RE: IPR2021-01406: Request to File Corrected Response
Date: Thursday, March 5, 2026 4:36:00 PM
Attachments: [image001.png](#)

Counsel,

Petitioner's request for authorization to file a corrected response to Patent Owner's request for Director Review is granted. Petitioner may file its corrected papers no later than Friday, March 6th.

Thanks.

IPR2021-01406
Ex. 3101

From: Richard Crudo <rcrudo@sternekessler.com>
Sent: Wednesday, March 4, 2026 1:26 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
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Subject: IPR2021-01406: Request to File Corrected Response

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Director Squires,

We represent Petitioner Roku, Inc. in the above-captioned IPR. We write to address Petitioners' Authorized Response to Director Review Request (Paper 78) filed on March 2, 2026. While reviewing the as-filed Response, we discovered that it inadvertently contains two factual misstatements. Pages 2 and 15 state that the '941 patent expired before it was asserted against anyone (as opposed to against Petitioners, specifically). Further, page 3 refers to the "sole" named inventor (as opposed to a named inventor). These errors are inadvertent and were not intended to mislead.

To ensure that the record is clear, we respectfully request authorization to file a corrected response, which would be limited to correcting these errors. Patent Owner has represented that it does not oppose this request.

If helpful, we can be available for a conference call to discuss this issue.

Thank you.

Richard Crudo
Counsel for Petitioner Roku, Inc.

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Director
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