

From: [Sangeeta G. Shah](#)
To: [Director PTABDecision Review](#); mspecht-ptab@sternekessler.com; jfitzsimmons-ptab@sternekessler.com
Subject: Patent Owners Request for Director Review IPR2023-00197
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Attachments: [Patent Owner Request for Director Review IPR2023-00197.pdf](#)

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Dear Director Vidal,

Patent Owner in the above-captioned proceedings respectfully requests Director Review of the final written decision on the grounds that the request presents important issues of law and policy as to whether partial final written decisions, those that fail to address all grounds and lack material evidentiary citations, run afoul of the AIA statutory framework, the Administrative Procedures Act and the Supreme Court's guidance in *SAS Inst., v. Iancu*, 138 S. Ct. 1348 (2018).

All counsel of record have been copied on this email, and a copy of the Request for Director Review has been filed in the PTACTS system as Paper 36, a copy of which is attached hereto. Should the Director require or wish to request supplemental briefing on any issues presented in the Request for Director Review, Patent Owner would be happy to provide it.

Respectfully submitted,
Sangeeta G. Shah
Counsel for Patent Owner