

From: [Price, Jeffrey H.](#)
To: [Director PTABDecision Review](#)
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Subject: IPR2023-00446 - Director Review Request
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Director,

Patent Owner, Centripetal Networks, LLC, respectfully requests Director Review of the Board's Institution Decision in IPR2023-00446. The concurrently filed request raises the following issues for the Director's review:

- 1) The Board's abuse of discretion in instituting review based on art already considered by the Office in the instant patent and related patents under 35 USC 325(d).
- 2) The important issue of law or policy of Office's use of the General Plastic framework to evaluate incremental petitions filed by unrelated parties. The General Plastic framework is not well suited to balance the public's interest in clearing wrongly issued patents against inequities to patent owners resulting from serial petitions filed by different parties.

Best regards,

Jeff Price

Counsel for Patent Owner, Centripetal Networks, LLC

Jeffrey H. Price

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Bio

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