

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.

Petitioner

v.

HONGJIA WANG

Patent Owner

IPR2023-00474

U.S. Patent No. 11,007,583

**PATENT OWNER'S STIPULATED MOTION TO EXPUNGE SUR-REPLY
(PUBLIC AND UNDER SEAL VERSIONS, PAPERS 56 AND 57)**

Viking Drill & Tool's Petition Filing Date: January 17, 2023

I. RELIEF REQUESTED

Pursuant to Board authorization (Ex. 2120), 37 C.F.R. § 42.5, and the agreement of the Parties, Patent Owner Hongjia Wang (“Mr. Wang”) respectfully requests that the Board expunge the public and under-seal versions of Patent Owner’s March 12, 2024 Sur-Reply (Papers 56 and 57).

Patent Owner is filing substitute public and under-seal versions of the Sur-Reply concurrently with this Motion, in accordance with the Board’s March 21, 2024 email authorizing Patent Owner to file the present Motion to Expunge and simultaneous filing of the substitute papers. (Ex. 2120).

II. REASONS FOR GRANTING RELIEF

Counsel for Mr. Wang certifies that it has conferred with counsel for Petitioner Viking Drill & Tool, Inc. regarding the relief sought. The present Motion to Expunge and substitute versions of the Sur-Reply represent the Parties’ compromise. As such, Viking does not oppose this Motion.

In particular, Viking objected to certain portions of Patent Owner’s Sur-Reply in IPR2023-00474 as raising new arguments. Although Mr. Wang disagrees with this argument, Mr. Wang and Viking have conferred and reached a compromise regarding an Amended Sur-Reply that Mr. Wang is filing concurrently herewith (both public and under-seal versions).

Dated: March 22, 2024

Respectfully submitted,

/Kelly W. Cunningham/

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Dated: March 22, 2024

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4) and 42.205(b) and the agreement of the parties, the undersigned certifies that on March 22, 2024, a true and correct copy of the **PATENT OWNER'S STIPULATED MOTION TO EXPUNGE SUR-REPLY (PUBLIC AND UNDER SEAL VERSIONS, PAPERS 56 AND 57)**

was served by electronic mail upon the following:

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