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Subject: Intex v. Bestway; IPR2023-00486, -487, -488, -489 - Request for Leave to Reply

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To the Honorable Board:

Pursuant to 37 C.F.R. § 42.108(c), Petitioner respectfully requests leave from the Board to file a 5-page reply brief to the Patent Owner Preliminary Responses (or POPRs) in each of the above-referenced proceedings. Good cause exists for such relief at least because: (1) Petitioner needs to alert the Board to one or more relevant PTAB decisions addressing the issues in dispute that have published since the filing of the Petitions; (2) Petitioner needs to correct Patent Owner's mischaracterizations of the decisions cited in its POPRs; and (3) despite having another opportunity to do so, Patent Owner still fails to commit to limiting the claims it might assert against Petitioner—indeed, in its POPRs, Patent Owner notes that the five claims asserted in the related district court case are merely those that are “initially asserted.”

Opposing counsel is copied on this correspondence. Petitioner understands that Patent Owner opposes this request.

To the extent the Board would find it helpful, the parties are available for a conference call at the following times: (1) July 5, 2023 between 1-5p ET; and (2) July 6, 2023 between 2-3p ET. The parties can provide additional availability if these times are not convenient for the Board.

Best regards,

Reid E. Dodge

Associate

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IPR2023-00486, IPR2023-00487, IPR2023-00488, IPR2023-00489

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