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**Subject:** Samsung v. Resonant - IPR2023-00992, -00993 & -01025  
**Date:** Wednesday, November 1, 2023 4:18:34 PM  
**Attachments:** [image001.png](#)

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Dear Honorable Board,

Petitioners request authorization to file a preliminary reply to each of Patent Owner's preliminary responses in the above-referenced three petitions as follows:

- In each of IPR2023-00992 and 00993, a 6 page preliminary reply directed to (i) whether the petition allegedly raises voluminous and excessive grounds without justification, and (ii) whether the Board should exercise its discretion to deny institution, including the proper application of the *Fintiv* factors here. Petitioners also seek permission to provide an updated stipulation (from the current *Sand+*-type stipulation to a *Sotera*-type stipulation) to address *Fintiv* factor 4 (overlap of issues between the parallel district court proceeding and these proceedings).
- In IPR2023-01025, a 3 page preliminary reply directed to whether the Board should exercise its discretion to deny institution, including the proper application of the *Fintiv* factors here. Petitioners also seek permission to provide an updated stipulation (from the current *Sand+*-type stipulation to a *Sotera*-type stipulation) to address *Fintiv* factor 4 (overlap of issues between the parallel district court proceeding and these proceedings).

Petitioners reached out to Patent Owner regarding this request, and Patent Owner indicated that it will not oppose a one-page reply in each IPR to allow Petitioners to provide their revised stipulation, so long as Petitioners would not oppose a one-page sur-reply by Patent Owner. Patent Owner opposes any request for additional briefing that goes beyond the *Fintiv* issue, including any proposed supplemental briefing on merits issues, excessive/voluminous grounds, or Section 325(d).

If the Board wishes to have a call to discuss this request, the parties will confer and provide times of mutual availability.

Best Regards,

Ali Sharifahmadian  
Counsel for Petitioners

IPR2023-00992  
Ex. 3001

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