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Subject: Sony Electronics v. Jawbone Innovations, IPR2023-1065 (U.S. Patent No. 10,779,080)
Date: Wednesday, October 18, 2023 1:55:39 PM

Dear Board,

Pursuant to 37 C.F.R. § 42.108(c), Petitioner Sony Electronics Inc. ("Sony") respectfully requests authorization to file a reply of no more than 5 pages to Patent Owner's Preliminary Response ("POPR") in the above-captioned case. Patent Owner Jawbone Innovations, LLC ("Jawbone") has used its POPR, in part, to respond to the Board's comment in the earlier *Google v. Jawbone* IPR (involving the same patent and prior art) inviting the parties in that case "to explain the significance of far-field versus near-field ..." as it relates to the asserted combination of the Ikeda, McCowan and Kanamori prior art references. (IPR 2022-01059, Paper No. 12 at 50.) The POPR in the present case includes an extensive discussion of those issues. (Paper No. 8, at 21-32.) As a matter of fundamental fairness, Sony requests that it be given the opportunity to respond briefly on those issues prior to a decision on institution, given that Jawbone has already had the opportunity to do so. Sony thus maintains that good cause exists for a reply.

The undersigned notified Jawbone of its intent to seek leave from the Board and met and conferred with Jawbone's counsel by email on October 18, 2023. Jawbone stated that it opposes the additional briefing requested by Sony and that if Sony's request is approved, Jawbone requests a 5-page sur-reply.

Respectfully submitted,

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