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Subject:	Petitioner Request for Reply in Sony Electronics Inc. v. Jawbone Innovations, LLC, IPR2023-01117 (Cls. 14-42, US Patent 8,321,213)
Date:	Thursday, November 16, 2023 8:17:31 PM

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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 3 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 an earlier *Amazon v. Jawbone* IPR (involving the same patent and prior art) "invit[ing] the parties to address in the Response, Reply, and Sur-reply how the specification affects the claim construction the Board will use in the Final Written Decision when determining claim 14's patentability." (IPR2023-00276, Paper No. 10 at 44.) The POPR in the present case includes an extensive discussion of those issues. (Paper No. 8, at 10-13, 14-20.) 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.

On November 15 and 16, 2023, the undersigned notified Jawbone of its intent to seek leave from the Board and requested Jawbone's consent to Sony's proposed reply based on the good cause discussed above. Jawbone responded it would not consent but that if Sony's request is approved, Jawbone requests a corresponding sur-reply of equal length.

Sony wishes to make the Board aware that it is also seeking replies in the following co-pending *Sony v. Jawbone* IPRs: IPR2023-01118 (Cls. 1-13, US Patent 8,321,213); IPR2023-01119 (US Patent 7,246,058); IPR2023-01153 (US Patent 11,122,357); IPR2023-01166 (US Patent 8,019,091); IPR2023-01176 (Cls. 29-44, US Patent 8,326,611); IPR2023-01177 (Cls. 1-28, US Patent 8,326,611); IPR2023-01222 (US Patent 8,467,543); and IPR2023-01228 (Cls. 1-22, 29-40, US Patent 8,503,691).

Respectfully submitted,

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