

From: [Argenti, Matthew](#)
To: [Trials](#)
Cc: [Torczon, Richard \(External\)](#); [Thomas, Tasha](#); [Jeffery Becker \(jeff.becker@bakerbotts.com\)](#); [Harrison Rich \(harrison.rich@bakerbotts.com\)](#); [Boyang Zhang \(boyang.zhang@bakerbotts.com\)](#); [Oaks, Brian](#)
Subject: RE: Request for Preliminary Reply in IPR2023-01287
Date: Monday, December 18, 2023 3:13:26 PM

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Board,

As Petitioner noted below, Patent Owner opposes Petitioner's request for a preliminary reply. However, to the extent the Board grants Petitioner's request, Patent Owner requests a surreply of equal length. Petitioner does not oppose.

Regards,

Matthew A. Argenti

Counsel for Patent Owner SZ DJI Technology
Wilson Sonsini Goodrich & Rosati
650 Page Mill Rd., Palo Alto, CA 94304
Direct: (650) 354-4154
Fax: (650) 493-6811

From: Oaks, Brian <Boaks@mwe.com>
Sent: Monday, December 18, 2023 11:18 AM
To: Trials <Trials@uspto.gov>
Cc: Argenti, Matthew <margenti@wsgr.com>; Torczon, Richard <rtorczon@wsgr.com>; Thomas, Tasha <tthomas@wsgr.com>; Jeffery Becker (jeff.becker@bakerbotts.com) <jeff.becker@bakerbotts.com>; Harrison Rich (harrison.rich@bakerbotts.com) <harrison.rich@bakerbotts.com>; Boyang Zhang (boyang.zhang@bakerbotts.com) <boyang.zhang@bakerbotts.com>; Oaks, Brian <Boaks@mwe.com>
Subject: Request for Preliminary Reply in IPR2023-01287

EXT - boaks@mwe.com

Dear Patent Trial and Appeal Board,

Petitioner Textron Specialized Vehicles Inc. respectfully requests leave to file a 4-page Preliminary Reply to Patent Owner's Preliminary Response in IPR2023-01287. Petitioner seeks a Reply to address a claim construction position Patent Owner takes in its Preliminary Response for the "restriction region" term. Petitioner previously requested, and was granted, a Preliminary Reply

regarding construction of this same claim term in IPR2023-01217. Petitioner believes the briefing would be helpful to the Board to consider whether Patent Owner's proposed construction is correct in light of the specification.

Petitioner has consulted with Patent Owner concerning the proposed Reply, and Patent Owner has indicated that it opposes Petitioner's request.

To the extent that the Board believes that a telephone conference is necessary, Petitioner and Patent Owner are available on the following days and times (Eastern):

- Tuesday, Dec. 19, 1:00-5:00
- Wednesday, Dec. 20, 1:00-5:00
- Thursday, Dec. 21, 3:00-5:00

Best regards,
Brian Oaks
Lead Counsel for Petitioner

BRIAN OAKS
Partner
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 726 2574 **Email** boaks@mwe.com
[Website](#) | [vCard](#) | [LinkedIn](#)
Katie Carnes, Assistant to Brian Oaks
Tel +1 737 282 2721 **Email** kcarnes@mwe.com

This message is a PRIVATE communication. This message and all attachments are a private communication sent by a law firm and may be confidential or protected by privilege. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained in or attached to this message is strictly prohibited. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Our [Privacy Policy](#) explains how we may use your personal information or data and any personal information or data provided or made available to us. Thank you.

Please visit <http://www.mwe.com/> for more information about our Firm.

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by others is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.