

From: [Director_PTABDecision_Review](#)
To: [Taylor R. Stemler](#); [Luchsinger, J. Bradley](#); [Tom Leach](#); [Yackey, Scott](#); [Cutler, Matthew](#); [Jeffrey Blake](#); [Robert A. Kalinsky](#); [Michael Erbele](#)
Subject: RE: IPR2024-00004: Director Review Request
Date: Monday, May 19, 2025 3:38:00 PM
Attachments: [image001.png](#)

Counsel,

Petitioner's request for an extension to file its authorized response to Patent Owner's Request for Director Review is granted. Petitioner may file its response no later than May 30, 2025.

Thanks.

IPR2024-00004
Ex. 3101

From: Taylor R. Stemler <TStemler@MerchantGould.com>
Sent: Monday, May 19, 2025 1:33 PM
To: Luchsinger, J. Bradley <bluchsinger@harnessip.com>; Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Tom Leach <TLeach@merchantgould.com>; Yackey, Scott <syackey@harnessip.com>; Cutler, Matthew <mcutler@harnessip.com>; Jeffrey Blake <JBlake@MerchantGould.com>; Robert A. Kalinsky <RKalinsky@merchantgould.com>; Michael Erbele <MErbele@MerchantGould.com>
Subject: Re: IPR2024-00004: Director Review Request

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

Dear Director,

I respectfully write to provide some additional context on this request.

I prepared all the drafts of the substantive papers submitted by patent owner in this proceeding, argued the oral hearing, and have been the main point of contact for resolving disputes that have arisen between Petitioner and Patent Owner throughout the course of this proceeding.

While Petitioner's lead counsel and other backup counsel have been involved in reviewing papers and arguments, I expect that I would need to take a significant amount of time away from my paternity leave to assist in developing our response by 5/22.

Best regards,

Taylor

Taylor R. Stemler

Attorney
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200

Minneapolis, MN 55402-4247
USA

Telephone (612) 371-5215

Fax (612) 332-9081

merchantgould.com

GUARDIANS OF GREAT IDEAS®

Note: This email message is confidential and may be privileged or otherwise protected by law. If you are not the intended recipient, please: (1) reply via email to the sender; (2) destroy this communication entirely, including deletion of all associated text files from all individual and network storage devices; and (3) refrain from copying or disseminating this communication by any means whatsoever.

Operating as Merchant & Gould, LLP, in California.

Please consider the environment before printing this email. Thank you.

From: Luchsinger, J. Bradley <bluchsinger@harnessip.com>

Sent: Monday, May 19, 2025 11:14 AM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Taylor R. Stemler <TStemler@MerchantGould.com>; Tom Leach <TLeach@merchantgould.com>; Yackey, Scott <syackey@harnessip.com>; Cutler, Matthew <mcutler@harnessip.com>; Jeffrey Blake <JBlake@MerchantGould.com>; Robert A. Kalinsky <RKalinsky@merchantgould.com>; Michael Erbele <MErbele@MerchantGould.com>

Subject: RE: IPR2024-00004: Director Review Request

CAUTION - External.

Dear Director:

I am counsel for Patent Owner, Nuhn Industries Ltd.

Patent Owner does not oppose the request to extend Petitioner's response deadline to May 30, 2025, but defers to the Director as to whether good cause has been shown by Petitioner for the requested extension. In particular, Patent Owner observes that the Petition for IPR2024-00004 (Paper 1, pp. 2-3) lists Thomas J. Leach as lead counsel for Petitioner and Robert A. Kalinsky, Jeffrey D. Blake, and Michael A. Erbele as back-up counsel along with Mr. Stemler. While we appreciate and respect that Mr. Stemler is out on paternity leave, Petitioner has not provided any representations as to why Messrs. Leach, Kalinsky, Blake, and Erbele are unavailable to prepare and file Petitioner's response by the current May 22, 2025 deadline.

Best regards,

James B. Luchsinger

Reg. No. 73,705

**Brad
Luchsinger**

O: [248.641.1281](tel:248.641.1281)
5445 Corporate Dr, Suite 200

Principal

Troy, MI 48098
[Bio](#) | [vCard](#)



Harness Dickey (hdp.com) is now Harness IP (harnessip.com)

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Sent: Friday, May 16, 2025 5:57 PM

To: Taylor R. Stemler <TStemler@MerchantGould.com>; Luchsinger, J. Bradley <bluchsinger@harnessip.com>; Tom Leach <TLeach@merchantgould.com>; Yackey, Scott <syackey@harnessip.com>; Cutler, Matthew <mcutler@harnessip.com>; Jeffrey Blake <JBlake@MerchantGould.com>; Robert A. Kalinsky <RKalinsky@merchantgould.com>; Michael Erbele <MErbele@MerchantGould.com>

Subject: RE: IPR2024-00004: Director Review Request

EXTERNAL EMAIL - USE CAUTION

Counsel,

Patent Owner may respond with its position as to Petitioner's request via email by Monday May 19th.

Thanks.

From: Taylor R. Stemler <TStemler@MerchantGould.com>

Sent: Friday, May 16, 2025 3:59 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Cc: bluchsinger@hdp.com; Tom Leach <TLeach@merchantgould.com>; syackey@hdp.com; mcutler@hdp.com; Jeffrey Blake <JBlake@MerchantGould.com>; Robert A. Kalinsky <RKalinsky@merchantgould.com>; Michael Erbele <MErbele@MerchantGould.com>

Subject: RE: IPR2024-00004: Director Review Request

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

Dear Director,

I am counsel for Petitioner, Bazooka-Farmstar, LLC. We acknowledge receipt of your email authorizing a response from Petitioner to the Patent Owner's Request for Director Review, with a current deadline of May 22, 2025.

Petitioner is grateful for the opportunity to provide its response. However, I am currently on paternity leave and will not return until May 23. Accordingly, Petitioner respectfully requests an extension of the response deadline to May 30, 2025.

I have reached out to counsel for Patent Owner regarding this request but have not yet received a

response. Given the approaching deadline and the nature of the request, we felt it prudent to raise this matter with the Director promptly.

Best regards,

Taylor Stemler
Counsel for Petitioner
Taylor R. Stemler
Attorney
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-4247
USA

Telephone (612) 371-5215

Fax (612) 332-9081

merchantgould.com

PROUDLY CELEBRATING 125 YEARS OF INNOVATION AND CLIENT SUCCESS

GUARDIANS OF GREAT IDEAS®

Note: This email message is confidential and may be privileged or otherwise protected by law. If you are not the intended recipient, please: (1) reply via email to the sender; (2) destroy this communication entirely, including deletion of all associated text files from all individual and network storage devices; and (3) refrain from copying or disseminating this communication by any means whatsoever. Operating as Merchant & Gould, LLP, in California.
Please consider the environment before printing this email. Thank you

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Thursday, May 15, 2025 2:32 PM
To: bluchsinger@hdp.com; Tom Leach <TLeach@merchantgould.com>; syackey@hdp.com; mcutler@hdp.com; Jeffrey Blake <JBlake@MerchantGould.com>; Taylor R. Stemler <TStemler@MerchantGould.com>; Robert A. Kalinsky <RKalinsky@merchantgould.com>
Subject: IPR2024-00004: Director Review Request

CAUTION - External.

Counsel,

Patent Owner's request for Director Review has been received in the above-referenced case. Petitioner is authorized to submit a response limited to the issues raised in the Director Review request, of no more than five pages, to be filed within five business days of this email. Any such response must be filed in P-TACTS, i.e., by selecting the "Other: Other" paper type and the paper must be titled "Authorized Response to Director Review Request" or it may not be considered. No new evidence is permitted. No further briefing is authorized at this time.

The Director will determine whether review will be granted or denied and the parties will be notified of the result of the Director Review request.

Thank you.

HARNESSE, DICKEY & PIERCE, PLC LEGAL NOTICE: The information contained in this transmission is intended only for the individual(s) or entity(ies) to whom it is addressed. It may contain information protected from use and/or disclosure by law, including information that is protected as confidential, attorney-client privileged, attorney work product and/or trade secrets. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the addressee, the reader is hereby notified that any use, distribution or copying of this communication is strictly prohibited. If you believe you have received this facsimile or message in error, please immediately notify us at our expense by return mail or e-mail and permanently delete or destroy all copies of the message.

To comply with U.S. Treasury regulations, we advise you that any discussion of Federal tax issues in this communication was not intended to be used, and cannot be used, by any person (i) to avoid penalties that may be imposed by the Internal Revenue Service, or (ii) to promote, market or recommend to another party any matter addressed herein. Any portions of this transmission containing controlled technical data are restricted by U.S. export laws and regulations, and may not be distributed or retransmitted to non-U.S. persons without appropriate licensing or a licensing exemption. Neither this information block, nor the signature block, nor the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included.