

From: [Trials](#)
To: [Scott Brown](#); [Trials](#)
Cc: [Casey, Kevin R.](#); [Shapiro, Ashley](#); [Matt Walters](#); [Ben Dykman](#)
Subject: RE: Precision Planting v. Maschio Gaspardo, IPR2024-00008; Request for additional words
Date: Wednesday, October 2, 2024 4:42:12 PM

Counsel,

Petitioner's request for an additional 1,400 words to address the construction of thrust-bearing element" in its Reply to Patent Owner's Response is granted. Patent Owner may also have an additional 1,400 words in its Sur-Reply to respond to Petitioner's construction of "thrust-bearing element."

Best Regards,
Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Scott Brown <sbrown@hoveywilliams.com>
Sent: Wednesday, October 2, 2024 11:52 AM
To: Trials <Trials@USPTO.GOV>
Cc: Casey, Kevin R. <KCasey@STRADLEY.COM>; Shapiro, Ashley <Ashapiro@stradley.com>; Matt Walters <mwalters@hoveywilliams.com>; Ben Dykman <bdykman@hoveywilliams.com>
Subject: Precision Planting v. Maschio Gaspardo, IPR2024-00008; Request for additional words

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Dear Board,

I am lead counsel for Petitioner in the above referenced matter.

Petitioner respectfully requests that it be permitted an additional 1,400 words for its Reply to Patent Owner's Response. Petitioner requests the additional words to address Patent Owner's claim construction position that the term "thrust-bearing element" of both independent claims should be interpreted as a means-plus-function limitation under 35 U.S.C. 112(f). This is a position that was not asserted by Patent Owner during the prior claim construction proceedings held before the district court in the parallel proceedings identified in the Petition. Petitioner did not anticipate this position and requests the additional words so that it can adequately respond to the proposed claim construction and implications for the grounds of the petition if the Board were to adopt that construction.

Petitioner has consulted with Patent Owner's counsel who have indicated that Patent Owner does not oppose this request so long as Patent Owner is given an additional 1400 words in its sur-reply.

IPR2024-00008
Ex. 3002

Respectfully submitted,

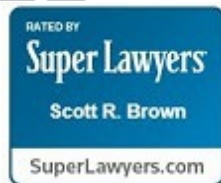
Scott R. Brown

Hovey Williams LLP
10801 Mastin Blvd., Suite 1000
84 Corporate Woods
Overland Park, Kansas 66210

DIR 913.232.5044

T 913.647.9050 | F 913.647.9057

<http://www.hoveywilliams.com>



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