

From: [Jim Glass](#)
To: [Director PTABDecision Review](#)
Cc: mmorlock@kilpatricktownsend.com; jlee@kilpatricktownsend.com; arinehart@kilpatricktownsend.com; kkoballa@kilpatricktownsend.com; [Playrix-IPRs](#)
Subject: IPR2024-00133
Date: Wednesday, May 29, 2024 8:05:46 PM
Attachments: [IPR2024-00133 Request for Director Review.pdf](#)

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

Dear Honorable Director Vidal,

I am lead counsel for Petitioner PLR Worldwide Sales Limited in IPR2024-00133. As required by the *Revised Interim Director Review Process*, Petitioner notifies the Director that Petitioner has filed a Request for Director Review of the Board's decision not to institute. A courtesy copy is attached.

As explained more fully in the Request, the Board denied institution in a rare split decision. The Majority abused its discretion here because: (1) the Majority's decision improperly relies on an interpretation of the claims that relies on the **subjective** views of a user – specifically, on “what a user might know or expect.” APJ Galligan fairly criticized the Majority's construction as “problematic,” (2) the record contains no evidence on which the Majority could rationally base its decision, and (3) the Majority did not address all of Petitioner's arguments.

Petitioner respectfully requests that the decision be vacated, and this IPR instituted.

Respectfully submitted,

James Glass
Lead Counsel for Petitioner

James M. Glass |Chair, Post-Grant Patent Practice| **Quinn Emanuel Urquhart & Sullivan, LLP** | 51 Madison Avenue, 22nd Floor, New York, NY 10010 | Office: +1.212.849.7142| [Web Bio](#)

IPR2024-00133
Ex. 3100