

From: [Kaiser, Jessica \(Perkins Coie\)](#)
To: [Director PTABDecision Review](#)
Cc: [haotan@archlakelaw.com](#); [Rose, Kate \(Perkins Coie\)](#); [SES-imagotag-IPRs@perkinscoie.com](#); ["Elyn0703"](#); ["Christopher Fahy"](#); [shenwang@archlakelaw.com](#)
Subject: IPR2024-00188, Hanshow v. SES-Imagotag: Director Review Request
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Attachments: [2024-06-03 Request for Director's Review IPR2024-00188.pdf](#)

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Director Vidal,

Patent Owner SES-Imagotag GmbH (now known as VusionGroup GmbH), requests Director Review (attached) of the decision granting institution in IPR2024-00188 (Paper 11) (May 20, 2024). Patent Owner believes this is the rare instance where multiple issues deserve Director Review. In compliance with the Revised Interim Director Review Process, however, Patent Owner identifies the following issues in order of priority:

1. The Board abused its discretion by drawing negative inferences from Patent Owner's lack of expert testimony supporting Patent Owner's POPR argument that Petitioner's conclusory expert testimony was not entitled to weight in supporting Petitioner's arguments.
2. The Board abused its discretion and made erroneous conclusions of law by basing its decision, in part, on a claim construction issue not raised by either party. The Board adopted a construction of "designed to" contrary to established law that had the effect of writing certain limitations out of the claim.

Sincerely,

Jessica Kaiser
Lead Counsel for Patent Owner

Jessica Kaiser | Perkins Coie LLP

PARTNER
1900 Sixteenth Street
Denver, Colorado 80202-5255
D. +1.303.454.2907
E. JKaiser@perkinscoie.com

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