From:	Woo, Philip
To:	James Zak; Trials
Cc:	David Hecht; Selina Kyle; khan@fr.com; Squire, Monté T.; Karl Renner; IPR42342-0136IP1@fr.com; devoto@fr.com; Woo, Philip
Subject:	RE: IPR2024-00232 and IPR2024-00775 - Request for Permission to File Adverse Judgement
Date:	Monday, April 7, 2025 1:56:00 PM

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Honorable Board,

Petitioner Apple Inc. respectfully submits this email in response to Patent Owner's email requesting permission to file requests for adverse judgment under 37 C.F.R. 42.73 in IPR2024-00232 and IPR2024-00775 and to lift the stay in EPR 90/015,052.

Petitioner Apple agrees to Patent Owner's request for adverse judgment in IPR2024-00232 and does not oppose Patent Owner's request to lift the stay in EPR 90/015,052. Should the Board grant adverse judgment in IPR2024-00232, Petitioner Apple respectfully requests that pursuant to 37 C.F.R. 42.73(c) the Board include in its judgment a recommendation to the Examiner in EPR 90/015,052 to consider whether the Patent Owner should be estopped under 37 C.F.R. 42.73(d)(3)(1) from "taking action inconsistent with the adverse judgment, including obtaining in any patent … [a] claim that is not patentably distinct from a finally refused or canceled claim."

Should the Board feel a conference call is necessary, the parties will provide a list of mutually agreeable times.

Respectfully submitted,

Philip Woo
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Ex. 3004
IPR2024-00232

From: James Zak <jzak@hechtpartners.com>
Sent: Monday, April 7, 2025 7:02 AM
To: Trials@uspto.gov
Cc: David Hecht <dhecht@hechtpartners.com>; Selina Kyle <admin@hechtpartners.com>; Woo, Philip <PWWoo@duanemorris.com>; khan@fr.com; Squire, Monté T. <MTSquire@duanemorris.com>; Karl Renner <renner@fr.com>; IPR42342-0136IP1@fr.com; devoto@fr.com
Subject: IPR2024-00232 and IPR2024-00775 - Request for Permission to File Adverse Judgement

Honorable Board,

Patent Owner Proxense respectfully requests authorization to file Requests for Adverse Judgment under 37 C.F.R. § 42.73 in IPR2024-00232 and IPR2024-00775, and to lift the stay in EPR 90/015,052.

Proxense has met and conferred with Petitioners' counsel over several days via email and has responded to all questions posed. However, Petitioners Apple and Microsoft have not yet stated their positions regarding the request.

Should the Board believe a conference call would be beneficial, the parties will promptly provide a list of mutually agreeable times.

Respectfully submitted,

James A. Zak, Esq.
Reg. No. 60190

Counsel for Patent Owner

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