

Filed: February 12, 2025

Filed on behalf of:

Patent Owner Willow Laboratories, Inc.
By: Brian C. Claassen (Reg. No. 63,051)
Jonathan E. Bachand (Reg. No. 67,884)
Douglas B. Wentzel (Reg. No. 74,897)
Irfan A. Lateef (Reg. No. 51,922)
Jarom D. Kesler (Reg. No. 57,046)

KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, Fourteenth Floor
Irvine, CA 92614
Tel.: (949) 760-0404
Fax: (949) 760-9502
E-mail: AppleIPR911@knobbe.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

WILLOW LABORATORIES, INC.,
Patent Owner.

Case IPR2024-00296
U.S. Patent 10,984,911

**PATENT OWNER'S AUTHORIZED MOTION TO FILE
SUPPLEMENTAL INFORMATION IN SUPPORT OF ITS SUR-REPLY**

Pursuant to 37 C.F.R § 42.123 and the Board’s February 11 authorization, Patent Owner (“Willow”) moves to submit Ex. 2082 as supplemental information.

The challenged claims recite an “opening”/“window” with a smaller area than the detector’s detection surface area. The portion of Apple’s Reply addressing this limitation relies on new exhibits, including Kimura (Ex. 1081) and excerpts of Willow expert’s rebuttal report from co-pending Delaware litigation (Ex. 1082). Reply, 5-6, 12. Willow now seeks to submit Ex. 2082, which is pages from the same rebuttal expert report about the same claim language and the same Kimura reference.

Under Rule 42.123(b), a party may submit supplemental information that “reasonably could not have been obtained earlier” where considering the information is “in the interests-of-justice.” The instant Motion meets these requirements.

First, Apple waited until its Reply to raise its arguments based on Kimura and excerpts of Willow’s Delaware rebuttal expert report. Thus, the Sur-Reply is Willow’s first opportunity to respond to those arguments, including with Ex. 2082.

Second, considering Ex. 2082 is in the interests-of-justice because it permits Willow to respond to Apple’s new argument that Kimura would have motivated making a “opening”/“window” with an area smaller than the detection surface area. Reply, 11-12. Indeed, Ex. 2082 (§186) shows the contrary opinion of Apple’s Delaware expert that “Kimura is silent” on these features. Ex. 2082 should also be considered under FRE 106 because Apple relies on excerpts of the same document.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: February 12, 2025

By: /Douglas B. Wentzel/
Douglas B. Wentzel (Reg. No. 74,897)
Customer No. 64,735

Attorney for Patent Owner,
Willow Laboratories, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e) and with the agreement of counsel for Apple, a true and correct copy of the foregoing **PATENT OWNER'S AUTHORIZED MOTION TO FILE SUPPLEMENTAL INFORMATION IN SUPPORT OF ITS SUR-REPLY** is being served electronically on February 12, 2025 to the e-mail addresses shown below:

W. Karl Renner, Reg. No. 41,265 Fish & Richardson P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR50095-0136IP2@fr.com	Roberto J. Devoto, Reg. No. 55,108 Kim H. Leung, Reg. No. 64,399 Fish & Richardson P.C. 60 South Sixth Street Minneapolis, MN 55402 Tel: 202-783-5070 Fax: 877-769-7945 Email: IPR50095-0136IP2@fr.com
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Dated: February 12, 2025

By: /Douglas B. Wentzel/

Douglas B. Wentzel (Reg. No. 74,897)
Customer No. 64,735

Attorney for Patent Owner
Willow Laboratories, Inc.