

From: [Trials](#)
To: [Richard Lin](#); [Trials](#)
Cc: [Tesla-Relink755-IPR](#); [Relink - Tesla](#); [Jerry Tice](#); [Stein, Alexander B.](#)
Subject: RE: IPR2024-00389 ('755 Patent) – Unopposed Request for Authorization for a Reply to the POPR
Date: Tuesday, June 11, 2024 1:29:28 PM
Attachments: [image001.png](#)

[EXTERNAL EMAIL]

Counsel:

From the Board –

Petitioner is authorized to file a five-page reply narrowly limited to the two issues identified in Mr. Stein's email below within five business days of this authorization. Patent Owner is authorized to file a five-page sur-reply within five business days of the filing of any reply. No new evidence may be filed with either brief, except that Petitioner shall file a copy of this email transmission as an exhibit to any reply filed pursuant to this authorization. No conference call is necessary at this time.

Regards,

Esther Goldschlager
Supervisory Paralegal Specialist
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Richard Lin <rlin@bdiplaw.com>
Sent: Monday, June 10, 2024 10:49 PM
To: Trials <Trials@USPTO.GOV>
Cc: Tesla-Relink755-IPR <Tesla-Relink755-IPR@morganlewis.com>; Relink - Tesla <BDIP_Relink-Tesla@bdiplaw.com>; Jerry Tice <jtice@bdiplaw.com>; Stein, Alexander B. <alexander.stein@morganlewis.com>
Subject: RE: IPR2024-00389 ('755 Patent) – Unopposed Request for Authorization for a Reply to the POPR

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Your Honors,

On behalf of the Patent Owner, I write to clarify that Patent Owner does not agree with Petitioner's characterization of Patent Owner's Preliminary Response. However, counsel for Petitioner correctly states that Patent Owner does not oppose Petitioner's request to file a 5-page reply, on the condition that Patent Owner is permitted to file an equivalent-length sur-reply.

Respectfully submitted,

Richard Lin, Reg. No. 56,682
Counsel for Patent Owner



Richard C. Lin

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From: Stein, Alexander B. <alexander.stein@morganlewis.com>

Sent: Monday, June 10, 2024 6:03 PM

To: trials@uspto.gov

Cc: Tesla-Relink755-IPR <Tesla-Relink755-IPR@morganlewis.com>; Relink - Tesla <BDIP_Relink-Tesla@bdiplaw.com>; Jerry Tice <jtice@bdiplaw.com>; Richard Lin <rlin@bdiplaw.com>

Subject: IPR2024-00389 ('755 Patent) – Unopposed Request for Authorization for a Reply to the POPR

Some people who received this message don't often get email from alexander.stein@morganlewis.com. [Learn why this is important](#)

[EXTERNAL]

Your Honors,

On behalf of the Petitioner, I am writing to request authorization to file a 5-page reply to Patent Owner's Preliminary Response (Paper 6) in IPR2024-00389 to address two issues:

1. Patent Owner's arguments concerning issues related to discretionary denial; and
2. Patent Owner's implicit claim-construction position concerning "adjust an output power as a function of the frequency of the voltage source," and how that overlaps with positions from the district court case.

After consulting with Patent Owner's counsel (copied on this email), they indicated that they do not oppose this request. The parties also agreed that Patent Owner should be permitted to file an equivalent-length sur-reply.

Respectfully submitted,

Alex Stein, Reg. No. 71,397
Counsel for Petitioner

Alexander B. Stein

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