

From: [Trials](#)
To: [Bombach, Miguel J. \(Perkins Coie\); Trials](#)
Cc: [PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com](#); [Greenthread-Monolithic-MS](#)
Subject: RE: Monolithic Power Systems v. Greenthread, IPR2024-00468-70 request for reply to preliminary response
Date: Wednesday, June 5, 2024 5:04:29 PM

Counsel,

From the Board –

Petitioner is authorized to file a 7-page preliminary reply to Patent Owner’s Preliminary Response in IPR2024-00468, -00469, and -00470, and Patent Owner is authorized to file a 7-page preliminary sur-reply in each proceeding. The preliminary reply is due on or before June 14, 2024, and the preliminary sur-reply is due on or before June 24, 2024. No conference call is needed at this time.

Regards,

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

From: Bombach, Miguel J. (Perkins Coie) <MBombach@perkinscoie.com>
Sent: Tuesday, June 4, 2024 4:41 PM
To: Trials <Trials@USPTO.GOV>
Cc: PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com; Greenthread-Monolithic-MS <Greenthread-Monolithic-MS@mckoolsmith.com>
Subject: Monolithic Power Systems v. Greenthread, IPR2024-00468-70 request for reply to preliminary response

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Dear Board,

Petitioner requests a reply to the patent owner preliminary response in IPR2024-00468, 69, and 70 as to the following issues:

1. Petitioner seeks to address Patent Owner’s unsupported arguments regarding the prior art’s teachings of the “aid the movement of minority carriers” phrase. E.g., POPR at 6-13.
2. Petitioner seeks to address Patent Owner’s arguments that the Petition should be time-barred because Sony/Dell/Intel are allegedly RPIs. E.g., 13-32.

Good cause exists under 37 C.F.R. § 42.108(c) because Patent Owner raises RPI issues and misrepresents art. *See, e.g., Unified Patents LLC, v. Intellectual Ventures*, IPR2022-00429, Paper 8 (PTAB 2022) (allowing reply to preliminary response to address RPI); *Zimmer Biomet CMF and*

Thoracic, LLC v. Intelligent Automation Design LLC, Inc, IPR2017-00727, Paper 10 (allowing Petitioner to file submission that identifies misstatements / misquotes).

Patent Owner's statement: Patent Owner does not oppose a preliminary response on the topic of the RPI issue, as long as Patent Owner is permitted to file a preliminary sur-reply of equal length. Patent Owner opposes the preliminary response to the extent it includes argument regarding teachings of the prior art and/or mapping of claim elements to prior art, because there is not good cause for such briefing. Specifically, Petitioner has had the opportunity to prepare its Petitions however it wanted to, Patent Owner has filed a preliminary response, and the Board is capable of assessing the relative merits of each party's briefing.

If the Board would find it helpful, the parties can present available dates for a conference call.

Regards,
Miguel

Miguel Bombach | Perkins Coie LLP

PARTNER

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