

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

Case No: IPR2024-00470

U.S. Patent No. 11,121,222

**PETITIONER'S MOTION TO STRIKE
PORTIONS OF PATENT OWNER'S SUR-REPLY**

I. INTRODUCTION

Petitioner brings this motion to strike certain improper arguments in Patent Owner's Sur-Reply (Paper 47) because they do not respond to arguments in Petitioner's Reply. The Board granted authorization for this motion in an April 9, 2025 email to the Parties.

II. PATENT OWNER'S IMPROPER ARGUMENTS

A. SUR-REPLY AT PGS. 13-15: ONODA FIG. 11

On pages 13-15 of the Patent Owner Sur-Reply, Patent Owner presents new argument and evidence supporting the argument (*e.g.*, EX1055, 91:22-92:4, 94:7-13, 178:1-18)—for claim limitations Patent Owner did not argue against in its Response—that Onoda's Figure 11 does not disclose the claimed graded concentration of dopants because the dopant concentration remains flat throughout the claimed surface layer.

III. CONCLUSION

For the reasons set forth above, Petitioner asks the Board to strike the arguments set forth above.

Dated: April 16, 2025

Respectfully submitted,

/Miguel Bombach/

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, a true and correct copy of the foregoing **PETITIONER’S MOTION TO STRIKE PORTIONS OF PATENT OWNER’S SUR-REPLY** was served by electronic mail on the Patent Owner via its attorneys of record:

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Respectfully submitted,

Date: April 16, 2025

/Anita Chou/

Anita Chou
Paralegal