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To: [Bombach, Miguel J. \(Perkins Coie\); Trials](#)
Cc: [Greenthread-Monolithic-MS; PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com; ai-ptab@perkinscoie.com; esterhay-ptab@perkinscoie.com; Schnurer-ptab@perkinscoie.com; kadio-ptab@perkinscoie.com; jiang-ptab@perkinscoie.com; Nicholas T. Matich; Alan Whitehurst; Arvind Jairam; Stuart McCommas; Neil Ozarkar](#)
Subject: RE: Monolithic Power Systems v. Greenthread, IPR2024-00550, 51, 52, 53 - Request for Reply
Date: Wednesday, July 31, 2024 10:08:18 AM

Counsel,

From the Board –

Petitioner is authorized to file a 7-page preliminary reply, within 7 days of this grant, that is limited to points (2) and (3) outlined in the email below. Patent Owner may file a 7-page preliminary sur-reply within 7 days of the filing of Petitioner's preliminary reply and shall be limited in the same manner.

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, July 30, 2024 11:36 PM
To: Trials <Trials@USPTO.GOV>
Cc: Greenthread-Monolithic-MS <Greenthread-Monolithic-MS@mckoolsmith.com>; PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com
Subject: RE: Monolithic Power Systems v. Greenthread, IPR2024-00550, 51, 52, 53 - Request for Reply

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Dear Board,

Petitioner (Monolithic Power Systems) follows-up on the below request.

Regards,
Miguel Bombach

Miguel Bombach | Perkins Coie LLP
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From: Bombach, Miguel J. (SDO)

Sent: Thursday, July 18, 2024 10:57 PM

To: Trials <Trials@USPTO.GOV>

Cc: Greenthread-Monolithic-MS <Greenthread-Monolithic-MS@mckoolsmith.com>; *Perkins Service MPS-Greenthread IPR <PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com>

Subject: Monolithic Power Systems v. Greenthread, IPR2024-00550, 51, 52, 53 - Request for Reply

Dear Board,

Petitioner requests a reply to the patent owner preliminary response in IPR2024-00550, 51, 52, 53 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 3-13
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., POPR at 20-39.
3. Petitioner seeks to address Patent Owner's arguments the Petition should be denied under *General Plastics* due to Patent Owner's lawsuits against other Defendants. E.g., POPR at 12-19.

Good cause exists under 37 C.F.R. § 42.108(c) because Patent Owner raises RPI issues and misrepresents art. Petitioner had requested and received a response to the above #1 and #2 in a prior case. See IPR2024-00468, 69, and 70 (Paper 16); see also *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). #3 is newly raised in this POPR for first time by Patent Owner.

Patent Owner's statement: Patent Owner does not oppose a preliminary response on the topic of the RPI issue (issue #2), 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 (issue #1), 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. Further, Patent Owner also opposes Petitioner's attempt to re-argue the General Plastic factors (issue #3), which it already addressed and argued in its Petitions. There is no good cause for Petitioner to again address this issue.

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

Regards,
Miguel

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