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Sent: Monday, September 16, 2024 1:16 PM
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Subject: RE: Microchip v. Aptiv | IPR2024-00494, IPR2024-00558

Trials,

Patent Owner opposes Petitioner's request for a preliminary reply. Lead counsel for Patent Owner has been out of the country since last Wednesday and was not able to respond to the request from Petitioner's counsel, which comes two months after the district court's claim construction order. Patent Owner disagrees that Petitioner could not reasonably have anticipated that the district court would not construe the term "having" since neither party proposed a construction for that term—a fact Petitioner knew when it filed its Petitions. Should the Board find a telephone conference necessary, Patent owner is available at the Board's convenience.

Respectfully submitted,
Andrew

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