From:	Kim Jackson
To:	Director_PTABDecision_Review
Cc:	hbatts@sheppardmullin.com; Chris Ponder; jliang@sheppardmullin.com; Nokia_IPRs_Amazon_HP
Subject:	Amazon.com, Inc. v. Nokia Technologies Oy - IPR2024-00627 - Patent Owner"s Request for Rehearing by the Director (Paper 17)
Date:	Tuesday, October 8, 2024 6:17:50 PM
Attachments:	image718453.png image067402.png 2024 10 08 Nokia v Amazon IPR2024-00627 (267) - Request for Director Review.pdf

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Dear Honorable Director Vidal,

I write on behalf of lead counsel for Nokia in IPR2024-00627. As required by the Revised Interim Director Review Process, Nokia notifies the Director that it has filed a Request for Director Review of the Board's decision to institute IPR. A courtesy copy is attached.

As explained more fully in the Request, the Board abused its discretion in instituting IPR. Nokia's priority ranking of issues is as follows: (1) 35 U.S.C. § 325, because the same or substantially the same references were considered during prosecution of the '267 Patent or earlier applications, (2) whether Walker discloses the first and second predictions of the challenged claims, and (3) whether a POSITA would be motivated to combined Karczewicz-I and Karczewicz-II as alleged.

Nokia respectfully requests that the decision be vacated and this IPR not instituted.

Respectfully Submitted,

Scott Hejny
Lead Counsel for Nokia

McKool Smith

Kim Jackson
Senior Paralegal
Austin, TX
Tel: (512) 853-8435
www.mckoolsmith.com

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