

From: [Trials](#)
To: gilfordb@gtlaw.com; [Trials](#)
Cc: lukasj@gtlaw.com; ming.yang@finnegan.com; jeffrey.smyth@finnegan.com; kai.rajan@finnegan.com; Joshua.Goldberg@finnegan.com
Subject: RE: IPR2024-00687 ('017 patent)
Date: Wednesday, June 25, 2025 1:10:52 PM

Counsel,

Patent Owner is authorized to file a motion to strike, limited to the three issues it identified in its email below. Patent Owner's motion is further limited to two pages, and shall be filed within three business days. Petitioner is authorized to file an opposition, limited to two pages, and due within three business days of Patent Owner's filing its motion.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: gilfordb@gtlaw.com <gilfordb@gtlaw.com>
Sent: Tuesday, June 24, 2025 1:11 PM
To: Trials <Trials@USPTO.GOV>
Cc: lukasj@gtlaw.com; ming.yang@finnegan.com; jeffrey.smyth@finnegan.com; kai.rajan@finnegan.com; Joshua.Goldberg@finnegan.com
Subject: RE: IPR2024-00687 ('017 patent)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Honorable Board,

Per the Board's request, Patent Owner seeks to strike the following new arguments and theories in Petitioner's Reply:

- Petitioner asserts for the first time in its Reply that the alleged "connecting surface" of Winkler includes **both** the elongated flat portion 32 **and** the curved portion 34. (Reply at 5:14-6:11.) In the Petition, however, Petitioner asserted only that Winkler's elongated flat portion 32, alone, is the alleged "connecting surface." (Petition at 23-25; EX1003, ¶¶ 67-70; *see also* Institution Decision at 23 (Board noting that "Petitioner argues that Winkler's **elongated flat portion 32** meets the recited 'connecting surface.'" (emphasis added).))

- Petitioner asserts for the first time in its Reply that Kataoka's alleged "second housing" (*i.e.*, housing 7) is an "insulating housing" because a portion of the housing (*i.e.*, cylindrical body 36) is purportedly "formed of a non-conductive resin." (Reply at 23:7-16 (citing Ex-1005-Kataoka at 13:21-25); *see also id.* at 21:19-22:1.) Petitioner did not raise this theory in the Petition, and the newly cited portion of Kataoka (*i.e.*, Kataoka at 13:21-25) was not cited anywhere in the Petition or the supporting declaration. (Petition at 68-70 (citing only Kataoka at FIGS. 1 and 6A-B, 4:56-66, 10:19-29, 12:17-64); EX1003, ¶ 142 (same).)
- Petitioner asserts for the first time in its Reply that the term "insulating housing" should be construed as merely a "protective housing." (Reply at 2:5-3:16, 22:10-23:7, 23 n. 2.) Petitioner's new construction was not advanced in the Petition and is inconsistent with the "electrically insulating" construction that was advanced in the Petition. (Petition at 64, 74-75; EX1003, ¶¶ 135, 149.)

Best regards,
Ben

Benjamin P. Gilford
Shareholder

Greenberg Traurig, LLP
77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
T +1 312.364.1658 | F +1 312.873.4694
gilfordb@gtlaw.com | www.gtlaw.com | [View GT Biography](#)

From: Trials <Trials@USPTO.GOV>

Sent: Tuesday, June 24, 2025 10:47 AM

To: Lukas Jr., James J. (Shld-Chi-IP-Tech) <lukasj@gtlaw.com>; ming.yang@finnegan.com; jeffrey.smyth@finnegan.com; kai.rajan@finnegan.com; Goldberg, Joshua <Joshua.Goldberg@finnegan.com>; Gilford, Benjamin P. (Shld-MSP-IP-Tech) <gilfordb@gtlaw.com>

Cc: Trials <Trials@USPTO.GOV>

Subject: RE: IPR2024-00687 ('017 patent)

EXTERNAL TO GT

Counsel,

Patent Owner is requested to respond to this email and specifically identify, by concept and corresponding page and line numbers of Petitioner's Reply, which arguments and/or theories are outside the proper scope of a reply.

Thank you.

Regards,

Andrew Kellogg,

Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: gilfordb@gtlaw.com <gilfordb@gtlaw.com>
Sent: Friday, June 20, 2025 8:55 PM
To: PTAB Hearings <PTABHearings@USPTO.GOV>
Cc: lukasj@gtlaw.com; ming.yang@finnegan.com; jeffrey.smyth@finnegan.com;
kai.rajan@finnegan.com; joshua.goldberg@finnegan.com
Subject: RE: IPR2024-00687 ('017 patent)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Honorable Board,

Patent Owner in the above-captioned proceeding respectfully requests leave to file a motion to strike certain portions of Petitioner's Reply. The Reply contains new arguments and/or theories that were not included in the Petition and are outside the proper scope of a reply.

Counsel for Patent Owner has met and conferred with counsel for Petitioner, and Petitioner has indicated it opposes Patent Owner's request for leave. Should the Board desire to have a conference call regarding Patent Owner's request, counsel for the parties can make themselves available next week at the following dates/times: Wednesday, June 25 at 2-4 pm ET; Thursday, June 26 at 2-5 pm ET; and Friday, June 27 at 12-4 pm ET.

Best regards,
Ben

Benjamin P. Gilford
Shareholder

Greenberg Traurig, LLP
77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
T +1 312.364.1658 | F +1 312.873.4694
gilfordb@gtlaw.com | www.gtlaw.com | [View GT Biography](#)