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Dear Board,

Pursuant to the order in the above-identified IPR, each of the parties believes that there is at least one responsive document, but disagree as to what those documents are. Petitioner believes that a sealed order dated May 2, 2025 is responsive because it concerns the construction of limitation [1.j] of the '757 patent at issue in this IPR that was proposed by patent owner, and hereby requests authorization to file a motion for entry of the Board's standard protective order so that petitioner may file the district courts' order. Patent owner does not oppose this request.

Patent Owner requests authorization to file documents evidencing a finding of validity by the Office when considering all the prior art from petition (Chinn, Kim, Takahashi, Yamamoto, EX-V7 User Guide) for related U.S. Patent No. 12,284,437 and file history. Petitioner opposes this request.

Please advise the parties as to how they are to proceed. The parties are generally available for a conference call next week if the Board so desires.

Sincerely,

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