

**From:** [Heintz, James M.](#)  
**To:** [Trials](#)  
**Cc:** [DLA-Samsung-Maxell](#); [Minutoli, Gianni](#); [Pluta, Robert G.](#); [Siddiqui, Saqib](#); [FW-CLIENT-Maxell-Samsung-Service](#)  
**Subject:** IPR2024-00735 and IPR2024-00777  
**Date:** Tuesday, September 23, 2025 4:40:53 PM  
**Attachments:** [image001.png](#)

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Dear Board,

The parties cannot agree on what documents are responsive to the general order entered in the above referenced IPRs. Petitioner believes that the only document that is properly submitted pursuant to the Board's general order is an order from the District Court dated September 18<sup>th</sup> granting Judgment as a Matter of Law (JMOL) that certain claims of the '815 patent are invalid and not infringed. Petitioner understands that counsel for patent owner wishes to submit pursuant to the Board's general order additional trial transcripts beyond those that were identified in Patent Owner's Supplemental Information Motion and file histories of predecessor applications for the '815 patents, and Petitioner does not agree that those documents are responsive to the Board's general order and therefore opposes the submission of those documents.

Please advise if Petitioner is authorized to file the District Court's JMOL order in the above-referenced IPRs.

Patent Owner's Position: Patent Owner does not disagree that the JMOL is within the scope of the Board's Order, but pursuant to the Board's Order believes additional information is also relevant and within the scope of the order, including submitting for the record (1) Related findings of validity by the Office when considering the prior art upon which the Petition is based (Bryant, Kaplan, WinTV, Chao, and Baumgartner), specifically related U.S. Patent Nos. 12,198,733, and 11,783,863, and associated file histories; (2) The entirety of the transcripts of Dr. Kia and the entirety of the transcript of Dr. Singh providing rebuttal, including demonstratives; and (3) trial transcripts highlighting Petitioner's use of the IPR institution decision with the jury.

Ex. 3102  
IPR2024-00735  
IPR2024-00777

Please advise whether the Patent Owner is authorized to file the foregoing materials identified by Patent Owner in the above-referenced IPRs.

Counsel for the parties are available at any time this evening for a call with the Board if one is desired.

Sincerely,

**James M. Heintz**

Chair, Post Grant Review Practice

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