

From: [Trials](#)
To: [Jeffrey Liang](#); [Trials](#)
Cc: [LegalTM-Amazon-Nokia-IPRs](#); [Tsui, Nick](#); [Gunder, Stacy](#); [Douglas, Christopher](#); [Haynes, John](#); [Zottola, Dana](#); [Rodriguez, Bryan](#); [Nokia-Amazon-IPRs](#)
Subject: RE: Amazon v. Nokia, IPR2024-00798, IPR2024-00799 - Request for One-Page Reply
Date: Tuesday, December 3, 2024 11:21:34 AM

From the Panel: As stated during the conference call with the parties, because Petitioner did not establish "good cause," Petitioner's request to file a reply to the Preliminary Response in IPR2024-00798 is denied.

Best regards,
Eric W. Hawthorne
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, November 26, 2024 3:03 PM
To: Jeffrey Liang <JLiang@sheppardmullin.com>; Trials <Trials@USPTO.GOV>
Cc: LegalTM-Amazon-Nokia-IPRs <LegalTM-Amazon-Nokia-IPRs@sheppardmullin.com>; Tsui, Nick <Nick.Tsui@alston.com>; Gunder, Stacy <Stacy.Gunder@alston.com>; Douglas, Christopher <Christopher.Douglas@alston.com>; Haynes, John <John.Haynes@alston.com>; Zottola, Dana <Dana.Zottola@alston.com>; Rodriguez, Bryan <Bryan.Rodriguez@alston.com>; Nokia-Amazon-IPRs <Nokia-Amazon-IPRs@alston.com>
Subject: RE: Amazon v. Nokia, IPR2024-00798, IPR2024-00799 - Request for One-Page Reply

Counsel,

A call is scheduled with the Board at **4:00 PM (ET) on Monday December 2nd**.

The dial-in number is: 877-998-2361. The passcode is: 8408478#.

Regards,

Esther Goldschlager
Supervisory Paralegal Specialist
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Jeffrey Liang <JLiang@sheppardmullin.com>
Sent: Monday, November 25, 2024 6:48 PM
To: Trials <Trials@USPTO.GOV>
Cc: LegalTM-Amazon-Nokia-IPRs <LegalTM-Amazon-Nokia-IPRs@sheppardmullin.com>; Tsui, Nick <Nick.Tsui@alston.com>; Gunder, Stacy <Stacy.Gunder@alston.com>; Douglas, Christopher

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<Christopher.Douglas@alston.com>; Haynes, John <John.Haynes@alston.com>; Zottola, Dana <Dana.Zottola@alston.com>; Rodriguez, Bryan <Bryan.Rodriguez@alston.com>; Nokia-Amazon-IPRs <Nokia-Amazon-IPRs@alston.com>

Subject: RE: Amazon v. Nokia, IPR2024-00798, IPR2024-00799 - Request for One-Page Reply

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Esther,

The parties have conferred and are available for a call at these times:

- Monday Dec. 2 at 12 pm PT onwards
- Tuesday Dec. 3 at 9 am PT – 12 pm PT
- Weds Dec. 4 at 10 am – 12 pm PT
- Thursday Dec. 5 at 10 am PT- 12 pm PT
- Friday Dec. 6 at 10 am PT onwards

Sincerely,

Jeffrey Liang
Counsel for Petitioner

From: Trials <Trials@USPTO.GOV>

Sent: Monday, November 25, 2024 12:39 PM

To: Jeffrey Liang <JLiang@sheppardmullin.com>; Trials <Trials@USPTO.GOV>

Cc: LegalTM-Amazon-Nokia-IPRs <LegalTM-Amazon-Nokia-IPRs@sheppardmullin.com>; Tsui, Nick <Nick.Tsui@alston.com>; Gunder, Stacy <Stacy.Gunder@alston.com>; Douglas, Christopher <Christopher.Douglas@alston.com>; Haynes, John <John.Haynes@alston.com>; Zottola, Dana <Dana.Zottola@alston.com>; Rodriguez, Bryan <Bryan.Rodriguez@alston.com>; Nokia-Amazon-IPRs <Nokia-Amazon-IPRs@alston.com>

Subject: RE: Amazon v. Nokia, IPR2024-00798, IPR2024-00799 - Request for One-Page Reply

Counsel,

Please provide mutually agreeable times for a conference, both this week and next week. Thank you.

Regards,

Esther Goldschlager
Supervisory Paralegal Specialist
Patent Trial & Appeal Board

U.S. Patent & Trademark Office

From: Jeffrey Liang <JLiang@sheppardmullin.com>

Sent: Monday, November 25, 2024 1:23 PM

To: Trials <Trials@USPTO.GOV>

Cc: LegalTM-Amazon-Nokia-IPRs <LegalTM-Amazon-Nokia-IPRs@sheppardmullin.com>; Tsui, Nick <Nick.Tsui@alston.com>; Gunder, Stacy <Stacy.Gunder@alston.com>; Douglas, Christopher <Christopher.Douglas@alston.com>; Haynes, John <John.Haynes@alston.com>; Zottola, Dana <Dana.Zottola@alston.com>; Rodriguez, Bryan <Bryan.Rodriguez@alston.com>; Nokia-Amazon-IPRs <Nokia-Amazon-IPRs@alston.com>

Subject: Amazon v. Nokia, IPR2024-00798, IPR2024-00799 - Request for One-Page Reply

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Dear Honorable Board,

Petitioner respectfully requests authorization to file a one-page preliminary reply regarding the institution of multiple petitions and priority date issues for the '602 patent. If granted, the same brief would be filed in both proceedings (IPR2024-00798, IPR2024-00799). Petitioner does not oppose Patent Owner being authorized to file a one-page preliminary sur-reply.

Good cause exists because Petitioner could not have anticipated Patent Owner's misrepresentation of the patent and Petition, or Patent Owner's at-odds positions between the two proceedings. Petitioner believes a succinct one-page brief would assist the Board by providing clarity on key issues. To avoid including unnecessary argument in this email to the Board, Petitioner does not detail the substantive arguments supporting this request. If the Board deems additional detail necessary to determine whether to authorize a preliminary reply, Petitioner can provide those details on a conference call.

Petitioner has conferred with Patent Owner (cc'd), who opposes this request. Patent Owner requested the inclusion of the following arguments:

Patent Owner opposes this request. Petitioner has not set forth good cause to seek a reply as to the merits. For example, Petitioner should have anticipated that Patent Owner would rely on the disclosure of the 602 Patent to demonstrate that the challenged claims are entitled to priority and, thus, should have addressed the disclosure of the 602 Patent in its petition. To the extent Petitioner is granted leave to file a reply to address Patent Owner's Preliminary Response, Patent Owner requests an equal number of pages for a sur-reply to address Petitioner's arguments.

Sincerely,

Jeffrey Liang
Counsel for Petitioner

SheppardMullin

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