

**From:** [Director\\_PTABDecision\\_Review](#)  
**To:** ["Stach, Jason"](#); [Price, Jeffrey H.](#); [McCammon, Luke](#); [Sahlsten, Sonja](#); [High, Robert](#); [Gomaco-IPRs](#); [Hannah, James](#); [Fuller, Jenna](#)  
**Subject:** RE: IPR2024-00835 - Request for Authorization to File Reply  
**Date:** Wednesday, December 31, 2025 1:37:00 PM

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Counsel,

Patent Owner's request for authorization to file a reply brief in support of its request for Director Review in the above identified proceeding is denied.

Thank you.

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**From:** Stach, Jason <Jason.Stach@finnegan.com>  
**Sent:** Wednesday, December 31, 2025 9:54 AM  
**To:** Price, Jeffrey H. <jeffrey.price@hsfkramer.com>; Director\_PTABDecision\_Review <Director\_PTABDecision\_Review@uspto.gov>  
**Cc:** McCammon, Luke <Luke.McCammon@finnegan.com>; Sahlsten, Sonja <Sonja.Sahlsten@finnegan.com>; High, Robert <Robert.High@finnegan.com>; Gomaco-IPRs <Gomaco-IPRs@finnegan.com>; Hannah, James <james.hannah@hsfkramer.com>; Fuller, Jenna <jenna.fuller@hsfkramer.com>  
**Subject:** RE: IPR2024-00835 - Request for Authorization to File Reply

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Dear Director Squires,

Gomaco disagrees with G&Z's characterization of the issues and believes that a reply is not warranted. Gomaco also believes that G&Z's lengthy argument in its request for authorization is not appropriate. Gomaco refrains from presenting an extended argument here, but if the Director authorizes G&Z to file a reply, Gomaco requests authorization to file an equal-length sur-reply.

Respectfully submitted,

Jason Stach  
Counsel for Gomaco

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**From:** Price, Jeffrey H. <jeffrey.price@hsfkramer.com>  
**Sent:** Tuesday, December 30, 2025 11:32 PM  
**To:** [Director\\_PTABDecision\\_Review@uspto.gov](#)  
**Cc:** Stach, Jason <[Jason.Stach@finnegan.com](#)>; McCammon, Luke

IPR2024-00835  
Ex. 3101

<Luke.McCammon@finnegan.com>; Sahlsten, Sonja <Sonja.Sahlsten@finnegan.com>; High, Robert <Robert.High@finnegan.com>; Gomaco-IPRs <Gomaco-IPRs@finnegan.com>; Hannah, James <james.hannah@hsfkramer.com>; Fuller, Jenna <jenna.fuller@hsfkramer.com>

**Subject:** IPR2024-00835 - Request for Authorization to File Reply

Dear Director Squires,

Patent Owner, G&Z, respectfully requests authorization to file a 4-page Reply responding to new arguments and material mischaracterizations of the record made in Petitioner's Authorized Response to Director Review Request in IPR2024-00835, and to file its Reply within three (3) business days of authorization (or on such schedule as the Director Review Team prefers). Petitioner was authorized to submit a response limited to the issues raised in the Director Review request. However, Petitioner used its response to supplement the record and substitute its own arguments and evidence in place of evidentiary findings that the Board did not make in the first instance. G&Z respectfully submits that there is good cause for the Director to authorize a limited Reply addressing the following issues:

1. Petitioner advances new arguments concerning its own GT-3200 paving machine's design, now citing it as the linchpin of its case. Response at 6-7. However, the Board made no findings about what the GT-3200 teaches, and there is no reference to the GT-3200 in Patent Owner's Request for Director Review. G&Z requests authorization to address the new arguments, and the implications of Gomaco's admission that the claimed slew drive arrangement was allegedly "known" from the GT-3200, which does not include (and was never alleged to include) a slew drive.
2. Petitioner advances a new, non-responsive argument concerning the Board's failure to properly consider evidence of copying that mischaracterizes the earlier IPR decisions it relies on. Response at 13-15. G&Z requests authorization to address Gomaco's material misrepresentations of the record and its implications for the Board's conclusions about copying in this case.
3. Petitioner attempts to excuse the Board's failure to analyze the evidence and argument in the case based on earlier litigation between the parties, but the scope of the claims, the parties' arguments, and the record evidence are all substantially different in this case. Response at 7-10. G&Z requests authorization to address Gomaco's suggestion the Board was entitled to overlook and ignore record arguments and evidence simply because related but materially different claims were previously invalidated and affirmed in a Rule 36 Judgment that did not pass on any specific issue.

Aside from these limited issues, G&Z believes that the record is clear and thanks the Director for his consideration of the case.

Kind regards,  
Jeffrey Price (Reg. No. 69,141)  
Counsel for Patent Owner, Guntert & Zimmerman

**Jeffrey H. Price**  
Special Counsel

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