From:	Melissa Kalka
To:	Director_PTABDecision_Review
Cc:	kaiser-ptab@perkinscoie.com; brewer-ptab@perkinscoie.com; carter-ptab@perkinscoie.com; Amazon-NokiaIPR@perkinscoie.com; beigelmacher-ptab@perkinscoie.com; baitchev-ptab@perkinscoie.com; Nokia_IPRs_Amazon_HP
Subject:	IPR2024-00847/IPR2024-00848
Date:	Thursday, December 26, 2024 7:45:10 PM
Attachments:	image872704.png image076855.png 2024 12 26 IPR2024-00847 (808) - PO"s Request for Rehearing by the Director.pdf 2024 12 26 IPR2024-00848 (808) - PO"s Request for Rehearing by the Director.pdf

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Dear Honorable Director Brent,

I write on behalf of lead counsel for Nokia in IPR2024-00847 and 00848. As required by the Revised Interim Director Review Process, Nokia notifies the Director that it has filed a Request for Director Review of the Board's decision to institute IPR. A courtesy copy is attached.

As explained more fully in the Request, the Board abused its discretion in instituting IPR. Nokia's priority ranking of issues is as follows: (1) whether the Board erred in determining that a POSITA would have combined two mutually exclusive modes of operation in Karczewicz into one mode without any findings about reasonable expectation of success, and (2) whether the Board erred in disregarding parts the inventor's lexicography of "skip coding mode" when determining Frojdh's IGMC mode discloses a "skip coding mode" because IGMC may sometimes result in zero-valued motion vectors and sometimes result in non-zero valued motion vectors as was the case with prior art modes discussed in the '808 Patent.

Nokia respectfully requests that these decisions be vacated and these IPRs not be instituted.

Respectfully Submitted,

Scott Hejny
Lead Counsel for Nokia

MCKOOL SMITH

Melissa Kalka
Senior Paralegal

Dallas, TX
Tel: (214) 978-6394
www.mckoolsmith.com

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