Lee, Tina

From: Trials
Sent: Tuesday, October 22, 2024 3:16 PM
To: Wroblewski, Karlee; Justin Chen; Amber L. Branum; Douglas, Christopher; Stevens, Scott; Hardymon, Bennett; Michael Heim; Chris Limbacher; Allan Bullwinkel; Iarnach IPL PL; IPR2024-00899; AT&T_Nokia_23-231
Cc: Trials
Subject: RE: IPR2024-00899: Leave to File Motion to Correct and Reply to POPR

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Counsel,

Petitioner is authorized to file, within five business days, a motion to correct the identified typographical error in the Petition. Petitioner should include the word "unopposed" in the motion's title and should represent that the motion is unopposed in the text of the motion. Petitioner is not authorized to file a Reply to Patent Owner's Preliminary Response.

Regards,

Tina

From: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Sent: Tuesday, October 8, 2024 9:46 AM
To: Trials <Trials@USPTO.GOV>
Cc: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>; Justin Chen <jchen@aatriallaw.com>; Amber L. Branum <abranum@hpcllp.com>; Douglas, Christopher <Christopher.Douglas@alston.com>; Stevens, Scott <Scott.Stevens@alston.com>; Hardymon, Bennett <Bennett.Hardymon@alston.com>; Michael Heim <mheim@hpcllp.com>; Chris Limbacher <climbacher@hpcllp.com>; Allan Bullwinkel <abullwinkel@hpcllp.com>; Iarnach IPL PL <IarnachIPLPL@hpcllp.com>; IPR2024-00899 <IPR2024-00899@aatriallaw.com>; AT&T_Nokia_23-231 <AT&T_Nokia_23-231@alston.com>
Subject: IPR2024-00899: Leave to File Motion to Correct and Reply to POPR

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Dear Board,

Pursuant to 37 C.F.R. § 42.104, Petitioners requests permission to file a motion to correct a typographical error in its Petition in IPR2024-00899. Specifically, the Petition mistakenly refers to "Claims 1-11 ("the Challenged Claims") of U.S. Patent No. 8,934,359 ("the '359 Patent")." *See* Paper 3 at 1. In view of the correct identification of claims and grounds as required by 37 CFR § 42.104(b) in Section IV, Petitioner seeks to correct its typographical error in the introduction (Section I) where the incorrect claims and patents were listed. Petitioners request 5 pages for its motion to correct. Patent Owner does not oppose Petitioner's request for a motion to correct.

Second, Pursuant to 37 C.F.R. § 42.108(c), Petitioners request permission to file a Reply to Patent Owner's Preliminary Response in IPR2024-00899 to address discretionary denial issues raised with respect to *Fintiv* factors 1 to 6. Petitioners

request three pages for a Reply. To the extent the Replies are permitted, Petitioner does not oppose a Sur-Reply of comparable scope and length.

Patent Owner's Position:
Patent Owner opposes Petitioners' request to address the *Fintiv* factors. Patent Owner disagrees with Petitioners' characterization that the arguments were unforeseeable and does not believe that Petitioners have made a showing of good cause sufficient to support the request.

Should the Board request a conference call, the Parties are available between 9:00am ET and 12:00pm ET on October 9, 2024.

Best,
Karlee

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