Pluta, Robert G.

From: Trials <Trials@USPTO.GOV>
Sent: Friday, June 13, 2025 8:50 AM
To: Pluta, Robert G.; Trials
Cc: Heintz, James M.; Minutoli, Gianni; DLA-Samsung-Maxell; FW-CLIENT-Maxell-Samsung-Service
Subject: RE: IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907

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Counsel,

Your request for authorization to file motions to submit supplemental information are denied and Patent Owner is NOT authorized to file any such motion in any of the proceedings.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Pluta, Robert G. <RPluta@mayerbrown.com>
Sent: Thursday, June 5, 2025 1:29 PM
To: Trials <Trials@USPTO.GOV>
Cc: Heintz, James M. <Jim.Heintz@us.dlapiper.com>; Minutoli, Gianni <gianni.minutoli@us.dlapiper.com>; DLA-Samsung-Maxell <DLA-Samsung-Maxell@us.dlapiper.com>; FW-CLIENT-Maxell-Samsung-Service <Maxell-Samsung-Service@mayerbrown.com>
Subject: IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907

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Dear Board,

Pursuant to 37 CFR 42.123(b), Patent Owner requests authorization to file motions to submit supplemental information in each of IPR2024-00735, IPR2024-00777, IPR2024-00828, IPR2024-00867, IPR2024-00906, and IPR2024-00907 (with each motion addressing only the information Patent Owner contends is relevant to each respective IPR). More specifically, Patent Owner intends to move to supplement the record to add the following information:

1. April 24, 2025, Public Motions Hearing transcript from Maxell, Ltd. v. Samsung Electronics et al.
2. May 19, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.

3. May 21, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.
4. May 23, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.
5. May 27, 2025 Public trial transcript from Maxell, Ltd. v. Samsung Electronics et al.

This information is new information and relevant to the instituted grounds insofar as Petitioner makes arguments contrary to the positions it has taken in these proceedings. Good cause exists because the trial was only completed on May 28, 2025.

The parties have conferred, and Petitioners oppose this request because Petitioners' pretrial disclosures disclosed the underlying information to Patent Owner prior to Patent Owner's deadlines for filing its Patent Owner Responses. Accordingly, no good cause exists to support Patent Owner's untimely request. Further, to the extent that Patent Owner is authorized to file any public trial transcripts as identified above in any IPR, Petitioner respectfully requests that Patent Owner be required or Petitioner be authorized to file the public transcripts for the entire proceeding pertaining to the subject matter of that IPR so that Patent Owner's testimony and arguments are also in the record.

To the extent necessary, the parties are available on the following days for a conference call: 6/5 (after 3pm ET), 6/6 (anytime).

Respectfully submitted,

Robert Pluta
Counsel for Maxell, Ltd.

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