

From: [Roseman, Carrie L.](#)
To: [Trials](#)
Cc: [Jeremiah W. Nixon](#); [IPTeam](#); [Michael.Morin@lw.com](#); [Ruth.Davila@lw.com](#); [Simon, Anthony G.](#); [Inge.Osman@lw.com](#)
Subject: RE: IPR2024-00932: Request for Adverse Judgment
Date: Monday, May 19, 2025 4:29:14 PM
Attachments: [image001.png](#)
[image002.png](#)

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Honorable Board,

As requested in the Board's email dated May 13, 2025, counsel for the Petitioner and Patent Owner met and conferred on May 16, 2025 and Patent Owner consents to the entry of adverse judgment.

Thank you.



Carrie Roseman | Paralegal
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Experience. Dedication. Results.

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From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, May 13, 2025 2:03 PM
To: Simon, Anthony G. <asimon@simonlawpc.com>; Inge.Osman@lw.com; Trials <Trials@USPTO.GOV>
Cc: Jeremiah W. Nixon <jnixon@simonlawpc.com>; IPTeam <IPTeam@simonlawpc.com>; Michael.Morin@lw.com; Ruth.Davila@lw.com
Subject: [External] RE: IPR2024-00932: Request for Adverse Judgment

Counsel,

Petitioner's request that the Board enter adverse judgment, or alternatively issue an order requiring Patent Owner to show cause why adverse judgment should not be entered, is denied without prejudice.

The parties are instructed to meet and confer sometime over the next seven (7) business days to determine Patent Owner's position on whether it opposes entry of adverse judgment, and update the Board accordingly via a joint email.

Regards,

Andrew Kellogg,

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

From: Simon, Anthony G. <asimon@simonlawpc.com>
Sent: Monday, May 12, 2025 10:36 AM
To: Inge.Osman@lw.com; Trials <Trials@USPTO.GOV>
Cc: Jeremiah W. Nixon <jnixon@simonlawpc.com>; IPTeam <IPTeam@simonlawpc.com>;
Michael.Morin@lw.com; Ruth.Davila@lw.com
Subject: RE: IPR2024-00932: Request for Adverse Judgment

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Honorable Board

Patent Owner has not refused to provide its position. The parties were trying to negotiate a settlement and the attorney for Petitioner with whom I was discussing switched firms. Also, due to religious holidays, a death in my family, and a trial I was out of the office for some time. We have been communicating with new counsel for Petitioner on this issue but did not have an answer due to these issues and informed Petitioner. Patent Owner is NOT requesting adverse judgment through these actions and asks that the Board not construe it as such.



Anthony G. Simon | Attorney
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From: Inge.Osman@lw.com <Inge.Osman@lw.com>
Sent: Sunday, May 11, 2025 6:54 PM

To: Trials@USPTO.GOV

Cc: Simon, Anthony G. <asimon@simonlawpc.com>; Jeremiah W. Nixon <jnixon@simonlawpc.com>; IPTeam <IPTeam@simonlawpc.com>; Michael.Morin@lw.com; Ruth.Davila@lw.com

Subject: [External] IPR2024-00932: Request for Adverse Judgment

Dear Honorable Board,

Patent Owner has not filed a Preliminary Response or a Response in IPR2024-00932.

Further, despite multiple efforts by Petitioner, Patent Owner has refused to provide its position on whether it opposes entry of adverse judgment. Petitioner believes that these actions should be construed as a request for adverse judgment pursuant to 37 C.F.R. § 42.73(b).

Petitioner respectfully requests that the Board enter adverse judgment in this proceeding or, in the alternative, issue an order requiring Patent Owner to show cause why adverse judgment should not be entered.

Respectfully,

Inge Osman
Counsel for Petitioner

Inge A. Osman

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