

From: [Trials](#)
To: [Nguyen, Jean](#); [Quincy Lu](#); [Trials](#)
Cc: [Arjomand, Mehran](#); [Jim Glass](#); [Blumenkopf, Bryan](#); [Yap, Alex S.](#); [MoFo Insta360-IPRs](#); [Mao, Stella](#); [Joseph Milowic III](#); [John McKee](#); [QE-GoPro-Arashi Vision](#); [Patrick Schmidt](#)
Subject: RE: IPR2024-00984
Date: Tuesday, August 19, 2025 3:50:11 PM
Attachments: [image001.png](#)

Counsel,

Patent Owner's request for leave to file the referenced exhibits in IPR2024-00984 is denied. Patent Owner may file the requested motion to strike. The motion shall not exceed five pages. The motion is due within five business days of this approval. Petitioner may file an opposition to the motion to strike which shall not exceed five pages. The opposition is due within five business days of service of the motion.

Regards,

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

From: Nguyen, Jean <JNguyen@mofo.com>
Sent: Wednesday, August 13, 2025 1:36 AM
To: Quincy Lu <quincylu@quinnemanuel.com>; Trials <Trials@USPTO.GOV>
Cc: Arjomand, Mehran <MARjomand@mofo.com>; Jim Glass <jimglass@quinnemanuel.com>; Blumenkopf, Bryan <BBlumen@mofo.com>; Yap, Alex S. <AYap@mofo.com>; MoFo_Insta360-IPRs <MoFo_Insta360-IPRs@mofo.com>; Mao, Stella <SMao@mofo.com>; Joseph Milowic III <josephmilowic@quinnemanuel.com>; John McKee <johnmckee@quinnemanuel.com>; QE-GoPro-Arashi Vision <qe-gopro-arashivision@quinnemanuel.com>; Patrick Schmidt <patrickschmidt@quinnemanuel.com>
Subject: RE: IPR2024-00984

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Dear Honorable Board,

Petitioner opposes Patent Owner's request to file a motion for leave to file an exhibit with its sur-reply. Petitioner's position (that a non-uniform transformation does not require a non-linear transformation) is clear from the Petition and accompanying declaration. (See, e.g.,

Petition (Paper 2) at 1, 3, 91; EX1002, ¶¶ 12, 16.) The exhibit has been available since January, months before Patent Owner's April 18 POR, and Patent Owner had the opportunity to cross examine Petitioner's expert (Dr. Katsaggelos) on the issue last week but chose not to question Dr. Katsaggelos on the exhibit during his deposition.

Petitioner also opposes Patent Owner's belated request to leave to file a motion to strike. See CTPG (Nov. 2019), 81. Petitioner is not raising "new theories" as Patent Owner alleges but is instead "respond[ing] to arguments raised in the [] patent owner response." 37 C.F.R. §42.23(b). For example, the Reply responds to POR arguments regarding the following issues:

- **Meulen and the Palm Treo:** POR (Paper 25) at 10, 15-17; Foroosh Decl. (EX2027) at ¶¶ 47, 57-58;
- **Meulen and sub-sampling:** POR (Paper 25) at 11, 30-31; Foroosh Decl. (EX2027) at ¶¶ 49, 81-82;
- **Fleming/Obara and cameras at the time of the '413 patent:** POR (Paper 25), 61-62, 72; Foroosh Decl. (EX2027) at ¶¶ 105-108, 125-126;

If the Board is inclined to grant briefing, Petitioner respectfully requests the following to avoid overburdening the Board:

- **Opening motion:** 5 pages to be filed within 5 business days of the Board's approval of Patent Owner's request
- **Opposition:** 5 pages to be filed within 5 business days of the service of the opening motion

If the Board is also inclined to grant Patent Owner a reply, Petitioner respectfully requests a sur-reply of equal length.

Respectfully Submitted,

Jean Nguyen, Ph.D.

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From: Quincy Lu <quincylu@quinnemanuel.com>

Sent: Tuesday, August 12, 2025 4:21 PM

To: Trials <trials@uspto.gov>

Cc: Nguyen, Jean <JNguyen@mofo.com>; Arjomand, Mehran <MArjomand@mofo.com>; Jim Glass <jimglass@quinnemanuel.com>; Blumenkopf, Bryan <BBlumen@mofo.com>; Yap, Alex S. <AYap@mofo.com>; MoFo_Insta360-IPRs <MoFo_Insta360-IPRs@mofo.com>; Mao, Stella <SMao@mofo.com>; Joseph Milowic III <josephmilowic@quinnemanuel.com>; John McKee <johnmckee@quinnemanuel.com>; QE-GoPro-Arashi Vision <qe-gopro-arashivision@quinnemanuel.com>; Patrick Schmidt <patrickschmidt@quinnemanuel.com>

Subject: IPR2024-00984

External Email

Dear Honorable Board,

Patent Owner respectfully requests in the above-captioned matter leave to file as exhibits a single page from Petitioner's expert's testimony at the ITC hearing, and a single page from Petitioner's ITC petition citing his testimony.

As Patent Owner set forth in an email to Petitioner last Monday and repeated during a meet and confer last Friday, good cause exists for this request because Patent Owner could not have foreseen the Petitioner Reply's position that non-uniform transformation does not require non-linear transformation despite Dr. Katsaggelos's testimony to the contrary. In addition, Petitioner's ITC petition was filed a few weeks ago, after Patent Owner's Response.

Separately, Patent Owner also respectfully requests leave to file a motion to strike the following Reply arguments and testimony from Dr. Katsaggelos as they present improper new theories of unpatentability.

- Petitioner's new theory combining the Palm Treo with Meulen. Reply 6-7, Ex. 1014 at ¶¶31-32, 37.
- Petitioner's new theory combining Meulen with sub-sampling. Reply 13-14, Ex. 1014 at ¶¶56-57.
- Petitioner's new theories for combining cameras, including the Canon PowerShot G15, with Fleming or Obara. Reply 21-24, 26-27, Ex. 1014 at ¶¶80-88, 91, 105-112.

Patent Owner proposes that the motion to strike briefing have the page limits set forth in 37 C.F.R. § 42.24 and follow the motion to exclude schedule, with the motion filed by September 16, Petitioner's opposition filed by September 23, and Patent Owner's Reply

filed by September 30.

Petitioner and Patent Owner have conferred and Petitioner opposes these requests.

If the Board believes a conference call is necessary, the parties will revert with their availability.

Respectfully Submitted,
Quincy Lu

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