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Subject: RE: IPR2024-01006, IPR2024-01011, and IPR2024-01013
Date: Wednesday, September 3, 2025 3:27:27 PM
Attachments: [image001.png](#)

Counsel: Petitioner's unopposed request is granted. Petitioner shall file its paper, in the format described in counsel's email below, no later than Monday, September 8, 2025. The Board will file a copy of this email correspondence as an exhibit in each proceeding.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
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From: Hyun Jin In <in@fr.com>
Sent: Tuesday, September 2, 2025 1:44 PM
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Subject: IPR2024-01006, IPR2024-01011, and IPR2024-01013

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Your Honors,

Patent Owner MRD's Sur-Replies in the above-captioned proceedings (IPR2024-01006, -01011, and -01013) cite to excerpts of Petitioner expert Dr. Yu Zhu's depositions from August 11, 2025, and August 12, 2025.

Petitioner LG Energy Solution (LGES) hereby requests the Board’s authorization to file in the above-captioned proceedings a paper (observations) identifying Dr. Zhu’s cross-examination testimony that provides the context Petitioner desires the Board to consider, in a concise fashion without argument.

More specifically, Petitioner’s observations will be a list in the form: “In response to Patent Owner’s citation to the transcript at ___, Petitioner cites the transcript at ___ for context,” without including any further argument or commentary. The paper will be similar to the one previously authorized by the Board in IPR2024-00294. *See Apple Inc. v. Masimo Corporation*, IPR2024-00294 Pap. 59 (PTAB May 15, 2025); *see also Zhongshan Broad Ocean Motor Co., Ltd. et al. v. NIDEC Motor Corp.*, IPR2014-01122 Pap. 34 (PTAB Sept. 10, 2015); *Micron Technology, Inc. v. Innovative Memory Systems, Inc.*, IPR2016-00330 Pap. 33 (PTAB March 8, 2017).

LGES believes that such identification of uncited testimony would provide context for the relied-upon excerpts that would be helpful in advance of oral hearing.

Counsel for LGES and counsel for MRD have met and conferred regarding this request. MRD does not oppose LGES’s request. Should the Board desire a call to discuss, the parties are jointly available on September 3-4 between 1-5pm ET.

Respectfully submitted,

Hyun Jin In
Counsel for Petitioner LG Energy Solution

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