

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: IPR2024-01186
Date: Tuesday, August 19, 2025 3:19:17 PM
Attachments: [image001.png](#)

Counsel,

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 2:08 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: IPR2024-01186

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Dear Honorable Board,

Petitioner opposes Patent Owner's belated request to leave to file a motion to strike. See CTPG (Nov. 2019), 81. Although Patent Owner conclusorily asserts that the Reply and Dr. Katsaggelos' testimony "present improper new theories of unpatentability," it only points to "discussion and analysis" of the Kwatra Paper (EX1023), which "respond to arguments raised

in the [] patent owner response." 37 C.F.R. §42.23(b). For example, the discussion responds to arguments in the POR (Paper 17) at 8-13, 16-26, and Foroosh Decl. (EX2018) at ¶¶46-56, 60-79.

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.

Of Counsel

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From: Quincy Lu <quincylu@quinnemanuel.com>

Sent: Tuesday, August 12, 2025 4:22 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: IPR2024-01186

External Email

Dear Honorable Board,

Patent Owner respectfully requests in the above-captioned matter leave to file a motion to strike the following Reply arguments and testimony from Dr. Katsaggelos. As Patent Owner set forth in an email to Petitioner last Monday and repeated during a meet and confer last Friday, the below arguments present improper new theories of unpatentability.

- Petitioner’s new discussion and analysis of the new reference, the “Kwatra” paper (EX1023), including Petitioner’s theory about how GoPro’s development documentation (EX1022) interpreted the “Kwatra” paper. Reply 13-15, Ex. 1017 at ¶¶68-74.

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 October 3, Petitioner’s opposition filed by October 10, and Patent Owner’s Reply filed by October 17.

Petitioner and Patent Owner have conferred and Petitioner opposes this request.

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

Respectfully Submitted,
Quincy Lu

Quincy Lu
Of Counsel,
Quinn Emanuel Urquhart & Sullivan, LLP

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