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**From:** Trials <Trials@USPTO.GOV>  
**Sent:** Monday, November 25, 2024 11:45 AM  
**To:** Oblon, Michael A.; Trials  
**Cc:** Johnson, Matthew W.; Soliman, Haytham; Werblowsky, Tova L.; oleg.khariton@dinsmore.com; weston.gould@dinsmore.com  
**Subject:** RE: Request for Leave to File a Reply to POPR in IPR2024-01229

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Counsel:

The panel determines that additional briefing, narrowly limited to the single issue identified in Mr. Oblon's email below, may be helpful to the Board in reaching a fair and expeditious decision on institution. Petitioner may file a five-page reply limited to that issue within five business days of this authorization. Patent Owner may file a five-page sur-reply within five business days of the filing of any reply. No new evidence may be filed with either brief, except that Petitioner shall file a copy of this email transmission as an exhibit to any reply filed pursuant to this authorization. No conference call is necessary at this time.

Regards,

Esther Goldschlager  
Supervisory Paralegal Specialist  
Patent Trial & Appeal Board  
U.S. Patent & Trademark Office

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**From:** Oblon, Michael A. <mobl@jonesday.com>  
**Sent:** Thursday, November 21, 2024 6:48 PM  
**To:** Trials <Trials@USPTO.GOV>  
**Cc:** Johnson, Matthew W. <mwj@jonesday.com>; Soliman, Haytham <hsoliman@jonesday.com>; Werblowsky, Tova L. <tw@jonesday.com>; oleg.khariton@dinsmore.com; weston.gould@dinsmore.com  
**Subject:** Request for Leave to File a Reply to POPR in IPR2024-01229

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POSCO FUTURE M CO., LTD. v. CAMX POWER LLC  
IPR2024-01229  
US Patent No. 9,391,317

Dear Honorable Board:

Petitioner filed the IPR petition in the above-captioned proceeding on July 29, 2024, seeking to cancel claims in U.S. Patent No. 9,391,317 ("the '317 Patent"). Patent Owner filed a Preliminary Response ("POPR") on November 14, 2024. Petitioner respectfully requests leave to file a reply under 37 C.F.R. § 42.108(c).

The POPR relies on new Exhibits 2001–2004 when discussing the Lampe-Onnerud prior art reference applied in Grounds I and II of the petition. These exhibits are four papers that were not of record and are not referenced by any exhibit to the petition. Several are dated significantly later than both the Lampe-Onnerud reference and the '317 Patent. Patent Owner relies on these new exhibits to make assertions that were not reasonably foreseeable, including arguments about how these new exhibits purportedly show what a person of ordinary skill in the art would have understood regarding the disclosures in Lampe-Onnerud. There is good cause for Petitioner to submit a reply to respond to Patent Owner's argument about this new evidence and place their disclosures into proper context with the petition.

Petitioner requests authorization to file a 5-page reply to address Patent Owner's reliance on Exhibits 2001–2004 and explain how these exhibits do not support Patent Owner's assertions regarding Lampe-Onnerud's teachings as they relate to Grounds I and II. Petitioner does not plan to submit new evidence in the reply.

Petitioner has conferred with Patent Owner's counsel, who indicated via email that Patent Owner opposes this request.

If the Board determines that a conference call would be beneficial, counsel for Petitioner and Patent Owner are available at the following times:

- **Tuesday, November 26:** 10:00 AM to 4:00 PM ET
- **Wednesday, November 27:** 10:00 AM to 1:00 PM ET
- **Monday, December 2:** 10:00 AM to 4:00 PM ET

Thank you for your attention and consideration.

Respectfully submitted,

Michael Oblon  
Counsel for Petitioner

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