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Subject: IPR2024-01247
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Your Honors,

I am counsel of record for Petitioners in IPR2024-01247. I write on behalf of Petitioners to seek leave to submit a short (no more than 5 pages) Reply to be due within 14 days of a decision granting leave. Petitioners seek a Reply to address Patent Owner's arguments that the Board should exercise its discretion to deny institution under *Fintiv*, as well as Patent Owner's claim construction of "multi-user detector decision unit."

Petitioners are mindful of both the Board's prohibition against argumentative emails to *Trials* and of 37 CFR § 42.108(c), which requires a request for a pre-institution Reply to "make a showing of good cause." Good cause exists because Petitioners could not have foreseen Patent Owner's arguments that the Board should deny institution under *Fintiv*. Petitioners also could not have foreseen Patent Owner's claim construction, because it is directly contrary to the position they took in *Collision v. Nokia et al.*, No. 2:21-cv-308-JRG (E.D. Tex.) and also inconsistent with their broad infringement contentions in *Collision v. Samsung*, 2:23-cv-587-JRG (E.D. Tex.). Petitioners also believe full briefing on the claim construction issue would benefit the Board.

Petitioners do not oppose Patent Owner receiving an equal-length sur-reply to be due within an equal time period.

The parties have met and conferred and Patent Owner opposes Petitioners' request.

To the extent the Board wishes to hold a hearing on this request, the parties will revert with their availability.

Respectfully,
Quincy Lu

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