

From: [Trials](#)
To: [Liaw, Winston x4497](#); [Trials](#)
Cc: [Day, Jim x4414](#); [Michael D. Saunders](#); [Bryan D. Atkinson](#)
Subject: RE: Adobe Inc. v. Jonathan E. Jaffe, IPR2024-01352 - Request to file preliminary reply
Date: Tuesday, March 4, 2025 1:21:36 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Counsel:

Petitioner's request for authorization to file a preliminary reply is denied, as there is insufficient time for the Board to consider the paper before the statutory deadline, which is in one week.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
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From: Liaw, Winston x4497 <WLiaw@fbm.com>
Sent: Tuesday, March 4, 2025 12:23 PM
To: Trials <Trials@USPTO.GOV>
Cc: Day, Jim x4414 <JDay@fbm.com>; Michael D. Saunders <MSaunders@dickinson-wright.com>; Bryan D. Atkinson <BATkinson@dickinson-wright.com>
Subject: Adobe Inc. v. Jonathan E. Jaffe, IPR2024-01352 - Request to file preliminary reply

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Dear Honorable Board:

Petitioner respectfully requests authorization to file a preliminary reply in response to Patent Owner's preliminary response (Paper No. 7). Petitioner seeks to provide a brief (2 page or less) update on the status of the related district court proceeding, which—in short—has not changed since the IPR petition was filed.

Petitioner has conferred with Patent Owner, and Patent Owner does oppose this request. Patent Owner objects to Petitioner's request because Petitioner does not identify any changed facts or circumstances to be addressed in Petitioner's requested reply that could not have been addressed in Petitioner's Petition. Patent Owner also objects to Petitioner's request as being untimely both because it is made months after the filing of Patent Owner's Preliminary Response, which was filed on December 11, 2024, and also because it is requested without allowing sufficient time for Patent Owner to meaningfully respond in a sur-reply prior to the Board's Institution Decision. Should the Board desire a conference call, the parties can confer to propose times of joint availability.

Regards,

Winston Liaw

Partner

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