

From: [Trials](#)
To: [Terry Sanks](#); [Fountain, Aaron G.](#); [Arjomand, Mehran](#); [Young, Jeffrey Gerard](#); [Litigation](#); [Anne Brooks](#)
Cc: [Trials](#)
Subject: RE: Subject: Request for Conference Call Regarding Authorization to File Motion to Correct, or, in the Alternative Replace Exhibits for IPR2024-01380 and IPR2024-01381
Date: Wednesday, December 17, 2025 2:38:27 PM
Attachments: [image010.png](#)
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[image016.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)

Counsel,

Petitioner is authorized to file a motion limited strictly to the issues described in the email dated December 16, 2025. The motion shall be filed no later than December 23, 2025. If Patent Owner chooses to oppose the motion, the opposition shall be filed no later than January 2, 2026.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
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(571) 272-5366



From: Terry Sanks <tsanks@firstiniplaw.com>
Sent: Tuesday, December 16, 2025 3:41 PM
To: Trials <Trials@USPTO.GOV>
Cc: Arjomand, Mehran <marjomand@mofo.com>; Fountain, Aaron G. <afountain@mofo.com>; Young, Jeffrey Gerard <jeffreyyoung@mofo.com>; Litigation <litigation@firstiniplaw.com>; Anne Brooks <abrooks@firstiniplaw.com>
Subject: Subject: Request for Conference Call Regarding Authorization to File Motion to Correct, or, in the Alternative Replace Exhibits for IPR2024-01380 and IPR2024-01381

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Honorable Board:

Pursuant to 37 C.F.R. § 42.20 and the Board's procedures, Petitioner respectfully requests a conference call with the Panel to seek authorization to file a Motion to Correct, or in the Alternative, a Motion to Replace Certain Exhibits in the above-captioned proceedings.

The requested relief concerns remedying inadvertent clerical errors to correct certain Exhibit numbers on the record to reflect their original submissions and to reflect complete Exhibits pursuant to 37 C.F.R. § 42.104(c) as follows:

I. IPR2024-01381, Patent No. 11,014,090:

- a. Relabel Exhibit 1052 – U.S. Patent No. 3,813,047 (Torrence) to reflect Exhibit 1012 with the same title;
- b. Relabel Exhibit 1054 - U.S. Patent No. 3,343,376 (Carman) to reflect Exhibit 1032 with the same title;
- c. Relabel Exhibit 1056 - U.S. Patent No. 8,302,754 (Yagi) to reflect Exhibit 1040 with the same title; and
- d. Replace or substitute a portion of Exhibit 1052 – U.S. Patent No. 3,813,047 (Torrence) to reflect a whole copy of the patent, as a portion of Column 5 is missing.

II. IPR2024-01380, Patent No. 9,827,568:

- a. Relabel Exhibit 1050 – U.S. Patent No. 3,813,047 (Torrence) to reflect Exhibit 1011 with the same title; and
- b. Replace or substitute a portion of Exhibit 10520 – U.S. Patent No. 3,813,047 (Torrence) to reflect a whole copy of the patent, as a portion of Column 5 is missing.

The requested motion is not intended to change the substance of any submission or argument and serves to merely correct any errors by presenting clean, fully complete replacement exhibits as necessary to ensure that the record accurately reflects the intended evidence and to avoid any potential confusion or prejudice to the parties.

Petitioners have conferred with opposing counsel regarding this request. Opposing counsel does not oppose holding a conference call and does not oppose the motion as presented.

We respectfully request that the Board schedule a conference call at its earliest convenience. Though we recognize the time may not work for the Panel, the Parties are generally available on Wednesday, December 17, at any time between 11:00 AM and

3:00 PM.

Please let us know if the Board requires alternative dates and times or requires further information in advance of the call.

Respectfully,

Terry M. Sanks, Esquire

Managing Partner

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