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To: [Joseph Mercadante](#); [Trials](#)
Cc: [PTAB](#); [Samsung-HID-IPRs](#); [Goldberg, Joshua](#); [Zang, Chen](#); [Harding, Alexander](#); [biju.chandran@finnegan.com](#); [Chang, Shawn](#); [Richard Cowell](#)
Subject: RE: IPR2025-01402 -- Request for Authorization to File Motion to Amend
Date: Tuesday, July 1, 2025 4:51:19 PM
Attachments: [image001.png](#)

Counsel,

The Panel reviewed Patent Owner's email dated July 1, 2025, concerning Patent Owner's intention to file a Motion to Amend. We understand the proposed motion will only cancel certain claims and will not seek to amend any claim. Regardless, we direct the parties to *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01229, Paper 15 (PTAB Feb. 25, 2019) (designated precedential), which addresses motion to amend requirements and burdens. We also direct the parties to the recent changes to Motion to Amend practice as reflected in 37 C.F.R. § 42.121.

If the parties do not have any questions for the panel concerning the Motion, Patent Owner has satisfied the procedural requirement for a conference and may file a Motion to Amend, subject to all applicable requirements. If, on the other hand, either party has questions for the panel concerning procedural issues, then the party may inform the Board that a telephone conference is desired, and the panel will schedule a telephone conference within the periods of counsel availability. When so informing the Board, Counsel is directed to state the questions and provide dates and times when the parties are available for a telephone conference.

Regards,

Andrew Kellogg,
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Honorable Board,

Patent Owner intends to request authorization from the Board to file a motion to amend in the above-captioned matter. The sole purpose of the motion to amend will be to seek to cancel claims 1-2 and 4-7 of the U.S. Patent No. 7,745,886. Patent Owner will not seek to amend any claims, and will not be proposing any substitute claims. Petitioner does not oppose Patent Owner's request.

Patent Owner's deadline to file a motion to amend is currently July 7, 2025. See Paper 17. In the event the Board does not provide authorization by that time, Patent Owner requests an extension of this date for the purposes of filing the requested motion to amend only. Patent Owner still intends to file its Patent Owner Response on July 7.

Best Regards,

Joseph Mercadante
Reg. No. 64,077
Counsel for Patent Owner



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