

From: [Greenleaf, Kevin R.](#)
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Cc: [Amol Kavathekar](#); [Yang, Stephen](#); [Greenleaf, Kevin R.](#); [Bickham, Timothy C.](#); [Gothia, Forrest](#); tle@hsml.com
Subject: IPR2024-01436 & -01439 \\ Request for Authorization to File Replies to the POPRs
Date: Thursday, January 16, 2025 3:51:04 PM

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Dear Board,

Petitioner requests authorization to file 7-page replies to the two recently filed POPRs for the following reasons.

IPR2024-01436 – Petitioner requests a reply to address the attorney argument that the primary references, Kaplan and Maeda, are not enabled because they provide “no indication of *how*” audio data is transmitted or routed to the transmitter. POPR 19, 31, 54; *see also, Duration Media LLC v. Rich Media Club LLC*, IPR2023-00953, Paper 78 (Vidal December 12, 2024) (addressing conflation of obviousness and enablement).

IPR2024-01439 –Petitioner, first, requests a reply to address the discretionary denial argument that “there are no differences between the prior art asserted in this Petition and the prior art already considered by the examiner” under 35 U.S.C. § 325(d). POPR, 58-66 (citing Ex-2002 and Ex-2003). Second, Petitioner requests a reply to address the attorney argument about whether the prior art disclosure includes “an input device” that both connects the peripheral device to a base unit and “triggers transfer of said user selected arbitrary media content.”

Patent Owner opposes the requested replies as good cause does not exist, since the above reasons could have been addressed in the initial petition. If the Requested Relief is granted, Patent Owner requests an equal-length sur-reply which Petitioner would not oppose.

The parties are available at the following times if necessary for a conference call (EST):

- Tuesday (Jan. 21): 3–4:30
- Wednesday (Jan. 22): 11:30–1
- Thursday Jan. 23: 2–3
- Friday (Jan. 24): after 9:30

Best regards,
Kevin

Kevin R. Greenleaf

My [pronouns](#) are: He/Him/His

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