

From: [Trials](#)
To: [Douglas Wilson](#); [PTAB Gerald Hryczyn](#); [PTAB Jie Xiang](#); [PTAB Adam Wichman](#); [PTAB Thomas Franklin](#); [PTAB Scott McKeown](#); [PTAB Rich Giunta](#); [Western Digital Litigation](#)
Cc: [Trials](#)
Subject: RE: Western Digital v. IP Bridge, IPR 2024-01447, -01493 - Motion to Strike New Exhibits
Date: Friday, November 21, 2025 9:39:32 AM

Counsel,

Petitioner is authorized to file motions to strike in IPR2024-01447 and -01493, limited to 8 pages, limited to seeking to strike Exhibits 2080 and 2081 from the records, as well as to strike portions of Patent Owner's Sur-replies referencing those exhibits. Petitioner should clearly set forth in the motions the specific portions of the Sur-replies that it seeks to strike. Petitioner's motions shall be filed on or before December 2, 2025. Patent Owner is authorized to file oppositions, limited to 8 pages, by December 12, 2025. Petitioner may file a 4 page reply by December 18, 2025. No new evidence is permitted.

Regards

Franchesca I. Alicea Villanueva
Supervisory Paralegal
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Douglas Wilson <doug.wilson@armondwilson.com>
Sent: Friday, November 14, 2025 2:02 PM
To: Trials <Trials@USPTO.GOV>
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Subject: Western Digital v. IP Bridge, IPR 2024-01447, -01493 - Motion to Strike New Exhibits

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Dear Honorable Board:

Petitioner requests authorization to file a motion to strike and expunge Patent Owner's

Ex. 3103
IPR2024-01447
IPR2024-01493

Exhibits 2080-2081 improperly filed with Patent Owner's Motions to Strike (Papers 31, 30) in the above-referenced IPRs.

On October 30, 2025, Patent Owner read large portions of unfiled Exhibit 2080 (marked Exhibit 2079) into the transcript at the deposition of Petitioner's expert, Dr. Bokor, over Petitioner's objections. Then, on Tuesday, November 11, Patent Owner stated it would seek Board authorization to file Exhibits 2080-EX2081 with its sur-reply briefs due November 19. Petitioner stated it opposed, and Patent Owner never sought Board authorization. Instead, Patent Owner unilaterally and without Board authorization filed them with its Motions to Strike. Petitioner now seeks to have the Board strike and expunge Exhibits 2080-2081.

Patent Owner opposes this request because (1) the Board's order granting a Motion to Strike includes no prohibition on citing evidence so filing these exhibits was not "improper[]" or unauthorized; (2) EX2080-EX2081 are incorporated by reference in the Petition-cited Parkin reference (EX1062, 3:24-27, 19:1-6) so the record is incomplete without them; (3) Petitioner's expert testified that he considered EX2080-2081 before offering his opinions (EX2085, 55:5-17, 77:12-78:25 [EX2080 is cited as EX2079 in EX2085]) so Petitioner should have included them in the record; and (4) Parkin says these applications describe the methods used to form the MgO barrier layer in Fig. 11 (EX1062, 23:5-11), which Petitioner cited for the first time in Reply, so EX2080-2081 are relevant to the Reply's argument about how Fig. 11's MgO layer is formed (Reply, 11).

Thank you,
Douglas Wilson
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