

From: [Director_PTABDecision_Review](#)
To: [Jay Yates](#); [Brian Tollefson](#); [Kyrie Cameron](#); terry@krameramado.com
Subject: RE: IPR2024-01459 Director Review Request
Date: Thursday, May 1, 2025 3:26:00 PM

Counsel,

Petitioner's request for authorization to file reply brief is denied.

Thanks.

IPR2024-01459
Ex. 3101

From: Jay Yates <JYates@pattersonsheridan.com>
Sent: Thursday, May 1, 2025 9:31 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Brian Tollefson <brian@tollefsonip.com>; Kyrie Cameron <KCameron@pattersonsheridan.com>; terry@krameramado.com
Subject: RE: IPR2024-01459 Director Review Request

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Director, Patent Owner is opposed to Petitioner's request to file a one (1) page reply. Petitioner's requested reply is unnecessary in view of Petitioner's 15 pages and Patent Owner's allotment of 5 pages. Patent Owner further disputes that Patent Owner made any misleading allegations in its Response to Director Review Request. On the existing record, including footnote 3 in Patent Owner's Response, which provides citations to how the term was used in the Petition and expert declaration, the Director can determine whether the arguments made in the Request are new or were previously made.

Regards,
Jay Yates

Jay Yates • Partner
PATTERSON + SHERIDAN LLP
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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Wednesday, April 30, 2025 2:38 PM
To: Brian Tollefson <brian@tollefsonip.com>; Jay Yates <JYates@pattersonsheridan.com>; Kyrie Cameron <KCameron@pattersonsheridan.com>; terry@krameramado.com
Subject: RE: IPR2024-01459 Director Review Request

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Counsel,

Patent Owner may respond with its position as to Petitioner's request via email by Thursday May 1st.

Thanks.

From: Brian Tollefson <brian@tollefsonip.com>

Sent: Wednesday, April 30, 2025 1:28 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; jyates@pattersonsheridan.com; kcameron@pattersonsheridan.com; terry@krameramado.com

Subject: Re: IPR2024-01459 Director Review Request

CAUTION: This email has originated from a source outside of USPTO. PLEASE CONSIDER THE SOURCE before responding, clicking on links, or opening attachments.

Dear Director,

Petitioner asks for permission to file a one (1) page reply in connection with its Request for Director review to respond to the misleading allegation by Patent Owner that Petitioner has raised new arguments. Petitioner is not now asserting any new grounds or arguments. The term "anticipate" was used a few times in its Request generically to mean that certain elements were fully disclosed, and was not intended to invoke a new ground based on "anticipation" as would be pursuant to 35 USC 102. Good cause exists because Patent Owner's reply is misleading and ignores the context of how the term was used, and a sur-reply will clarify that no new grounds or arguments are being asserted.

Respectfully,

Brian Tollefson

= TollefsonIP

Patent and Trademarks

326 First Street, Suite 202

Annapolis, Maryland 21403

443-699-2450

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Sent: Thursday, April 24, 2025 9:56 AM

To: Brian Tollefson <brian@tollefsonip.com>; jyates@pattersonsheridan.com <jyates@pattersonsheridan.com>; kcameron@pattersonsheridan.com <kcameron@pattersonsheridan.com>; terry@krameramado.com <terry@krameramado.com>

Subject: IPR2024-01459 Director Review Request

Counsel,

Petitioner's request for Director Review has been received in the above-referenced case. Patent

Owner is authorized to submit a response limited to the issues raised in the Director Review request, of no more than five pages, to be filed within five business days of this email. Any such response must be filed in P-TACTS, i.e., by selecting the "Other: Other" paper type and the paper must be titled "Authorized Response to Director Review Request" or it may not be considered. No new evidence is permitted. No further briefing is authorized at this time.

The Director will determine whether review will be granted or denied and the parties will be notified of the result of the Director Review request.

Thank you.