

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

T-MOBILE USA, INC., AT&T SERVICES, INC., CELLCO
PARTNERSHIP D/B/A VERIZON WIRELESS, ERICSSON INC., AND
NOKIA OF AMERICA CORPORATION,
Petitioner,

v.

HEADWATER PARTNERS II LLC,
Patent Owner.

IPR2024-01468
Patent 9,094,868 B2

PATENT OWNER'S PRELIMINARY SUR-REPLY

Patent Owner and Petitioner have reached agreement to stay the related district court proceeding pending this *inter partes* review, and are working to jointly propose a stipulated stay in that proceeding.

Accordingly, Patent Owner withdraws its request for discretionary denial under *Fintiv*, but maintains its arguments on the merits.

Date: March 11, 2025

Respectfully submitted,

/James A. Milkey/

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Counsel for Patent Owner

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on March 11, 2025, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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