

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case No. IPR2024-01494
Patent No. 11,968,909

**PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW OF
THE BOARD'S DENIAL OF PATENT OWNER'S
MOTION TO TERMINATE *EX PARTE* REEXAMINATION
PURSUANT TO 35 U.S.C. §315(d) AND 37 C.F.R. §42.122(a)**

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Exhibit	Description
2001	Kittel, C., <i>Introduction to Solid State Physics</i> , 6th Edition, 1986, pgs. 13-15, 18, 23 (“Kittel”)
2002	Duke, C.B., <i>Tunneling in Solids</i> , Solid State Physics: Advances in Research and Applications, 1969, pgs. 1, 6-7, 34-35, 78-79 (“Duke”)
2003	Definition of “ferromagnetism,” Oxford English Reference Dictionary, Second Edition, pg. 513 (“Oxford English Reference Dictionary”)
2004	“Ferromagnetism,” The New Encyclopaedia Britannica: Volume 4, 15th Edition, 2003, pgs. 748-749 (“Britannica”)
2005	Zhu, J.G., et al., <i>Magnetic tunnel junctions</i> , Materials today, Volume 9, Number 11, November 2006, pgs. 36-45 (“Zhu”)
2006	Wulfhekel, W., et al., <i>Single-crystal magnetotunnel junctions</i> , Applied Physics Letters, Volume 78, Number 4, January 2001, pgs. 509-511 (“Wulfhekel”)
2007	Hard disk Market – Global Industry Analysis and Forecast (2025-2032), https://www.maximizemarketresearch.com/marketreport/global-hard-disk-market/63888/
2008	Yuasa citations, https://scholar.google.com/citations?view_op=view_citation&hl=en&user=kb5EQcsAAAAJ&citation_for_view=kb5EQcsAAAAJ:3fE2CSJlr18C
2009	Yuasa citations 2, https://scholar.google.com/citations?view_op=view_citation&hl=en&user=kb5EQcsAAAAJ&citation_for_view=kb5EQcsAAAAJ:kNdYIxmWkoC
2010	Wang, S.X., et al., <i>Magnetic Information Storage Technology</i> (Academic Press 1999) (Chapter 6)
2011	RESERVED

Exhibit	Description
2012	Parkin, S.P, et al., <i>Giant tunneling magnetoresistance at room temperature with MgO (100) tunnel barriers</i> , Nature Materials, 3 (2004), 862-867
2013	Transcript of Deposition of Jeffrey Bokor, Ph.D. (June 24, 2025)
2014	Transcript of Deposition of Jeffrey Bokor, Ph.D. (June 25, 2025)
2015	Djayaprawira, D., et al., <i>230% room-temperature magnetoresistance in CoFeB/MgO/CoFeB magnetic tunnel junctions</i> , Applied Physics Letters, 86(9) (2005)
2016	Yuasa, S., et al., <i>High Tunnel Magnetoresistance at Room Temperature in Fully Epitaxial Fe/MgO/Fe Tunnel Junctions due to Coherent Spin-Polarized Tunneling</i> , Japanese Journal of Applied Physics, 43(4B), (2004) L588
2017	Yuasa, S., et al., <i>Giant room-temperature magnetoresistance in single crystal Fe/MgO/Fe magnetic tunnel junctions</i> , Nature Materials, 3(12) (2004), 868-871
2018	Statutory Disclaimer Under 37 C.F.R. §1.321(a)
2019	Marrows, C.H., <i>Spin-polarised currents and magnetic domain walls</i> , Advances in Physics, 52(8), (2005) 585-713
2020	Tsymbal, E., et al., <i>Handbook of Spin Transport and Magnetism</i> , 2012
2021	Nagamine, Y, et. al., <i>Ultralow resistance-area product of $0.4 \Omega (\mu\text{m})^2$ and high magnetoresistance above 50% in CoFeB/MgO/CoFeB magnetic tunnel junctions</i> , Applied Physics Letters, 89 (2006), 16507
2022	Nakatani, T., et al., <i>Read sensor technology for ultrahigh density magnetic recording</i> , MRS Bulletin, Materials Research Society, 43(2), (2018) 106-111
2023	Jiang, B., et al., <i>Tunneling magnetoresistive devices as read heads in hard disk drives</i> , Journal of Magnetism and Magnetic Materials, 571 (2023) 170546

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2024	The 23rd (FY2022) Japan Society of Applied Physics Achievement Award Recipients (with English translation), The Japan Society of Applied Physics, https://www.jsap.or.jp/outstanding-achievementaward/recipients/recipients23
2025	JSAP Outstanding Achievement Award Recipients, The Japan Society of Applied Physics, https://www.jsap.or.jp/english/awards/outstanding-achievementaward/recipients
2026	2021 New Fellows, IEEE Japan Council, https://ieeelp.org/en/kaiin/fellow/fellow21.html
2027	JST owned patent wins Future Creative Invention Prize at the National Invention Award 2021, Japan Science and Technology Agency, https://www.jst.go.jp/report/2021/210525_e.html
2028	Dr. Shinji Yuasa profile, https://www.jst.go.jp/impact/sahashi/en/system/index.html
2029	AIST wins three Science and Technology Awards in the 2016 Minister of Education, Culture, Sports, Science and Technology Commendation for Science and Technology, https://www.aist.go.jp/aist_j/news/prize/pr20160412_3.html
2030	Yuasa, S., <i>Magnetoresistance and Spin-Transfer Torque in Magnetic Tunnel Junctions</i> , IEEE Transactions on Magnetics, IEEE Magnetics Society Distinguished Lecturers for 2012, Vol. 48, No. 1, 2012
2031	Shinji Yuasa – IEEE Magnetics Society, https://ieeemagnetics.org/contact/shinji-yuasa#biography
2032	AIST: 20th Tsukuba Prize winner, https://www.aist.go.jp/aist_j/news/prize/itemid025-000077.html
2033	Announcing the winners for “Tsukuba Prize,” “Esaki Leona Prize,” and “Tsukuba Encouragement Prize”: Ibaraki Prefectural Science and Technology Promotion Foundation (with English translation), https://www.tsukuba-sci.com/cms/?p=9853

Exhibit	Description
2034	AIST: 34th Inoue Harunari Prize, https://www.aist.go.jp/aist_j/news/prize/itemid025-000082.html
2035	RESERVED
2036	RESERVED
2037	Saito, Y. et al. <i>Correlation between barrier width, barrier height, and dc bias voltage dependences on the magnetoresistance ratio in Ir-Mn exchange biased single and double tunnel junctions</i> , Jpn J. Appl. Phys. 39, L1035–L1038 (2000)
2038	Maat, S., et al., <i>Physics and Design of Hard Disk Drive Magnetic Recording Read Heads</i> , Handbook of Spintronics, 2014
2039	Soukup, R.J., <i>Hot Electron Transport in Vacuum Deposited Thin Film Emission Diodes</i> , University of Minnesota, Ph.D., Physics, solid state, 1969, pgs. 1-209 (“Soukup-Dissertation”)
2040	U.S. Patent Application Publication No. 2006/0003185 A1
2041	J. C. Slonczewski, <i>Conductance and exchange coupling of two ferromagnets separated by a tunneling barrier</i> , Phys. Rev. B 39, 6995-7002 (1989)
2042	RESERVED
2043	RESERVED
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2045	RESERVED
2046	RESERVED
2047	RESERVED
2048	RESERVED
2049	RESERVED

Exhibit	Description
2050	RESERVED
2051	RESERVED
2052	RESERVED
2053	Declaration of Caroline A. Ross, Ph.D.
2054	<i>Curriculum Vitae</i> of Caroline A. Ross, Ph.D.
2055	U.S. Application No. 10/824835 File History (Partial)
2056	Citations to Butler: https://scholar.google.com/scholar?hl=en&as_sdt=0%2C22&q=Butler+et+al.%2C+Spin-dependent+tunneling+conductance+of+Fe%7CMgO%7CFe+sandwiches%2C+63+Phys.+Rev.+B+054416+%282001%29&btnG=
2057	Citations to Soukup: https://scholar.google.com/scholar?hl=en&as_sdt=0%2C22&q=Soukup+et+al.%2C+Voltage-Current+Characteristics+for+Electrical+Conduction+Through+Thin+MgO+Films%2C+41+J.+Appl.+Phys.+3229-+3236+%281970%29&btnG=
2058	Errata to EX2013 - Deposition of Jeffrey Bokor, Ph.D. (June 24, 2025)
2059	Errata to EX2014 - Deposition of Jeffrey Bokor, Ph.D. (June 25, 2025)
2060-2071	RESERVED
2072	EX2024 - The 23rd (FY2022) Japan Society of Applied Physics Achievement Award Recipients (with English translation), The Japan Society of Applied Physics, https://www.jsap.or.jp/outstanding-achievementaward/recipients/recipients23 with Amended Certification of Translation [SUPPLEMENTAL EVIDENCE - NOT FILED]
2073	Certified English Translation of EX2029 - AIST wins three Science and Technology Awards in the 2016 Minister of Education, Culture,

Exhibit	Description
	Sports, Science and Technology Commendation for Science and Technology, <i>available at</i> https://www.aist.go.jp/aist_j/news/prize/pr20160412_3.html [SUPPLEMENTAL EVIDENCE - NOT FILED]
2074	Certified English Translation of EX2032 - AIST, “Winner of the 20th Tsukuba Award,” <i>available at</i> https://www.aist.go.jp/aist_j/news/prize/itemid025-000077.html [SUPPLEMENTAL EVIDENCE - NOT FILED]
2075	Certified English Translation of EX2034 - AIST: 34th Inoue Harunari Prize, <i>available at</i> https://www.aist.go.jp/aist_j/news/prize/itemid025-000082.html [SUPPLEMENTAL EVIDENCE - NOT FILED]
2076	RESERVED
2077	RESERVED
2078	Declaration of Dara Del Rosario [SUPPLEMENTAL EVIDENCE - NOT FILED]
2079	Transcript of October 24, 2025 Board Conference Call
2080	RESERVED
2081	RESERVED
2082	RESERVED
2083	RESERVED
2084	RESERVED
2085	Transcript of Deposition of Jeffrey Bokor, Ph.D. (Oct. 30, 2025)
2086	Transcript of Deposition of Jeffrey Bokor, Ph.D. (October 31, 2025)
2087	Sur-Reply Declaration of Caroline A. Ross, Ph.D.
2088	Errata to EX2085 - Deposition of Jeffrey Bokor, Ph.D. (Oct. 30, 2025)

Exhibit	Description
2089	Errata to EX2086 - Deposition of Jeffrey Bokor, Ph.D. (Oct. 31, 2025)
2090	Patent Owner's Demonstrative Exhibits
2091	Request for <i>ex parte</i> reexamination of U.S. Patent No. 11,968,909, Control No. 90/016,097, filed by Western Digital Technologies, Inc. on March 29, 2026.

I. STATEMENT OF RELIEF REQUESTED

Patent Owner asks that the Director terminate reexamination Control No. 90/016,097 that Petitioner filed against the same '909 Patent that is the subject of this IPR.

On March 29, 2026—just weeks before the Final Written Decision (“FWD”) was due in this IPR—Petitioner filed its reexamination request challenging the '909 Patent. EX2091 (“Request”). The resulting reexamination proceeding is Control No. 90/016,097. The Request challenges the same claims at issue here, relies on prior art Petitioner knew about before the Petition was filed, and was timed in an attempt to circumvent 35 U.S.C. §315(e)’s estoppel provision.

On April 28, 2026, the Board issued an FWD in this IPR and Petitioner lost. Paper 58. The Board found that Petitioner failed to prove any challenged claim unpatentable. *Id.* Petitioner could not file a reexamination request today because it is now estopped from doing so under 35 U.S.C. §315(e). Petitioner’s strategy of waiting more than a year after filing its IPR petition to file its reexamination Request, and waiting to file it until the eve of FWD to avoid estoppel, should not be rewarded. Patent Owner asks the Director to exercise his authority under 35 U.S.C. §315(d) to terminate reexamination Control No. 90/016,097 that Petitioner requested.

The Board authorized Patent Owner to file a Motion (Paper 54) to terminate the reexamination. But the Board denied that Motion. Paper 57. The Board’s reasoning for doing so was legal error. The Board found that it would contravene the statute to terminate the reexamination proceeding before a reexamination was ordered. Paper 57, 4. That is plainly wrong. Section 315(d) explicitly empowers the Director to prevent Petitioner’s second serial attack on the ’909 Patent and terminate Petitioner’s reexamination without waiting until after the reexamination is ordered. The Director should do just that.

II. REASONS SHOWING GOOD CAUSE FOR REQUESTED RELIEF

A. The Director Has the Authority to Terminate the Reexam

The Director has the authority, during the pendency of this IPR, to terminate Petitioner’s reexamination which is a “proceeding or matter involving the patent ... before the Office.” 35 U.S.C. §315(d) (“during the pendency of an inter partes review, if another proceeding or matter involving the patent is before the Office, the Director may determine the manner in which the inter partes review or other proceeding or matter may proceed, including providing for... *termination of any such matter or proceeding.*”).

The Office has consistently explained that an unordered reexamination is a “proceeding.” For example, in promulgating 37 C.F.R. §42.122(a)—which grants the Board the authority to terminate another proceeding or matter in language that

largely tracks Section 315(d)—the Office was explicit that the covered matters include an *unordered* “*ex parte* reexamination *proceeding*” where the three-month statutory time period under 35 U.S.C. §303 is running.” 77 Fed. Reg. 48680, 48690 (Aug. 14, 2012). The Request initiated a new “matter or proceeding” (Control No. 90/016,097) for which §303’s three-month time period is currently running. Director Squires’s 4/1/26 Official Gazette Notice, entitled “*Pre-order* Procedure regarding Substantial New Question determination in *ex parte Reexamination Proceedings*,” also characterizes an unordered reexam as a “proceeding.” The MPEP does too. MPEP §2224 (“*After the filing of the request for ex parte reexamination*, any letters sent to the... Office relating to the *resulting ex parte reexamination proceeding* should identify the proceeding”); MPEP §2294 (an “[*e*]x parte reexamination *proceeding*[] may be concluded” and “the *proceeding... brought to an end... by a denial of reexamination*”).

And even if the unordered reexam were not a “proceeding” (it is), the reexam is undeniably a “*matter* involving the patent... before the Office.” 35 U.S.C. §315(d). Section 315(d) indisputably gives the Director the authority to terminate the reexam.

The Board did not find that the unordered reexam is not a “proceeding” or “matter” before the Office. Paper 57, 3. Instead, the Board erred by finding that the reexam is not a “proceeding or matter that may be terminated *at its current stage*.”

Id. (emphasis original). There is no such qualifier in Section 315(d) that limits the Director’s authority to terminate a reexamination proceeding or matter at any particular “stage.” The Board also mischaracterized Patent Owner’s Motion as a request to deny the reexam. Paper 57, 3. The request was that the Board “terminate” the reexam under the explicit authority to do so in Section 315(d). Paper 54; *see also* 35 U.S.C. §315(d) (providing for “**termination** of any such matter or proceeding.”)

The Board found there was “no basis for the Board to contravene that statutory language [in 35 U.S.C. §§303(a) and 304] and terminate Petitioner’s reexamination request, prior to the Director making the required determination” about whether to order the reexamination. Paper 57, 4. The suggestion that the Director has the authority to terminate an ordered reexam but is powerless to terminate the unordered reexam is directly refuted by the statute. The “statutory language” the Board was concerned might be “contravene[d]” if the reexam were terminated under Section 315(d) is 35 U.S.C. §§303(a) and 304, which are part of Chapter 30 of the Patent Statute. Section 315(d) is explicit that the Director’s authority to terminate another proceeding or matter is “[n]otwithstanding ... Chapter 30.” 35 U.S.C. §315(d) (“**Notwithstanding** sections 135(a), 251, and 252, and **Chapter 30**, during the pendency of an inter partes review, if another proceeding or matter involving the patent is before the Office, the Director may

determine the manner in which the inter partes review or other proceeding or matter may proceed, including providing for stay, transfer, consolidation, or termination of any such matter or proceeding.”).

The Board committed legal error by finding that the Board and the Director lacked statutory authority to terminate the unordered reexam. Section 315(d) expressly provides that authority.

B. The Director Should Terminate the Reexam

1. The Request’s Grounds Could Have Been in the Petition

The Request is based on two references (Parkin and Kishi) Petitioner knew, or should have known, about when the Petition was filed. Petitioner admits Parkin (Publ. No. 2009/0324814) is among the ’909 Patent’s “References Cited.” Request, 9. And Petitioner admits Kishi was used to reject claims in a child of the ’909 Patent on June 26, 2024 (*id.*, 1–2), *three months before* the Petition was filed on September 27, 2024. Petitioner cited Kishi, the Examiner’s Kishi-based rejection and the child application abandonment in its petition in IPR2025-00701, filed March 6, 2025 (more than a year before filing its reexam Request) and could have done so in this Petition against the ’909 Patent too.

2. Buyer’s Remorse on the Petition’s Grounds is Not Justification for a Second Serial Attack on the ’909 Patent

Petitioner knew or should have known of both references before filing its Petition *more than a year and a half ago*. *Supra* II.B.1. Petitioner is a

sophisticated company represented by experienced IPR counsel. Petitioner made a strategic choice to pursue *different grounds* in this IPR. Petitioner should not be permitted to hold references in reserve as a fallback in case the IPR trial unfolds in a manner unfavorable to Petitioner—precisely as it did here.

Sanctioning Petitioner’s conduct would undermine the intent of Section 315(e)’s estoppel provision. An instituted IPR suffices to challenge a patent. *See e.g., PacifiCorp v. Birchtech*, IPR2025-00687, Paper 40, 2–3 (Squires Jan. 12, 2026) (precedential) (granting director review, vacating decisions granting institution, and remanding) (only one petition should have been instituted against the challenged patent rather than multiple where—*as in this IPR*—petitioners “had ample room” in the petition to present multiple grounds).

3. Allowing the Reexam to Proceed Would Waste Office Resources, Risk Inconsistent Results and Prejudice Patent Owner

If Petitioner believed it would prevail at FWD its requested reexamination would have been unnecessary. The Request served one purpose—to act as a hedge for Petitioner in case it lost at FWD. That loss at FWD has now come to pass. Petitioner sought to game the system and avoid Section 315(e)’s estoppel provision by filing its Request just before the FWD issued. *See infra* §II.B.5. Now that Petitioner has lost at FWD (Paper 58), the Director should not sanction Petitioner’s conduct and should terminate the reexam.

Waste of Office Resources – after having chosen to seek an IPR and have the Office devote substantial resources to conducting this trial, Petitioner seeks to have the Office devote more resources to addressing its second serial challenge to the '909 Patent. That would be a waste of the Office's limited resources.

Potential for Inconsistent Results – after having failed to prove any claim unpatentable in IPR before the Board, Petitioner seeks a second bite at the apple and hopes to get a different ***inconsistent*** result from a different part of the Office (the CRU) on those same claims via reexamination.

In arguing against termination of the reexam before the Board, Petitioner trumpeted the merits of its second serial challenge, alleging that it was based on a piece of prior art (Kishi) that the Examiner used to reject claims in a child of the '909 Patent and alleging that Patent Owner conceded these claims were unpatentable by abandoning the child application. Petitioner cited no authority supporting its assertion that abandonment of the child application conceded unpatentability because there is no such authority. Applicants abandon continuations for many reasons and often weigh the cost of continuing prosecution against the incremental value of the continuation claims over the issued claims. Abandoning the child application does not estop Patent Owner from defending the patentability of its '909 Patent claims and does not remove Petitioner's burden to prove those claims unpatentable.

Kishi and the Examiner’s rejection based on it provide no justification for Petitioner’s delay in pursuing its reexamination Request. The Examiner’s rejection based on Kishi was made *three months before the Petition was filed* and Petitioner was aware of it at least by March of 2025—*more than a year before the reexam request was filed*. *Supra* §II.B.1; IPR2025-00701, Paper 1 at 5 (“The Examiner found that ‘Kishi ... teaches a barrier height of (0.1 eV to 0.85 eV) and (.2eV to .5eV)’” and IPB “abandon[ed]” the application). Petitioner knew or should have known about Kishi before the Petition in this IPR was filed and *chose* to not use it in its grounds. That is no justification for a second serial challenge now—18 months later—based on Kishi.

Prejudice to Patent Owner –Petitioner benefitted from seeing Patent Owner’s arguments at trial, deposing Patent Owner’s expert, gauging the Board’s reaction to the parties’ argument at oral hearing, and having the opportunity to “adjust its invalidity challenges based on information it obtained” from its prior challenge. *Ariosa Diagnostics, Inc. v. Illumina, Inc.*, IPR2014-01093, Paper 81 at 15 (May 24, 2016) (terminating a reexam). Petitioner was not shy about trying to take full advantage of this information in its Reexam Request. Request, 1 and 14-16 (seeking to use IPB’s IPR arguments against it) and 15 (“Patent Owner’s decision to defend the ’909 Patent claims based on its recitation of specific tunnel barrier heights further demonstrates its claims are unpatentable.”). Petitioner

should not be permitted to use its instituted IPR against the '909 Patent to “adjust its invalidity challenges based on information it obtained” therefrom. *Ariosa*, IPR2014-01093, Paper 81 at 15.

Finally, Petitioner’s delay in filing its reexam request (*infra* §II.B.5) compounds the prejudice to Patent Owner. The litigation against Petitioner has been stayed for nearly 18 months pending the outcome of this IPR. If Petitioner’s reexam moves forward, Petitioner will undoubtedly argue that the stay should continue even after the IPR ends. By waiting to seek reexam until 18 months after the Petition was filed, rather than pursuing it in parallel with this IPR, Petitioner seeks to lengthen the stay and further delay Patent Owner’s litigation. The Director should not reward that gamesmanship which is highly prejudicial to Patent Owner.

4. Failing to Terminate the Reexam Would Render Section 315(e)’s Estoppel Provision Toothless

Having lost at FWD, Petitioner is now estopped from bringing another challenge before the Office against the '909 Patent. 35 U.S.C. §315(e)(1) (“The petitioner in an inter partes review of a claim in a patent ... that results in a final written decision ... may not request or maintain a proceeding before the Office with respect to that claim on any ground that the petitioner raised or reasonably could have raised during that inter partes review.”). But Section 315(e)’s estoppel provision does not apply to Petitioner’s *already-filed* reexam proceeding because the requestor does not “maintain” a reexam. *Gesture Tech. Partners*, 160 F.4th

1317, 1321 (Fed. Cir. 2025) (affirming the Office’s decision to not terminate a reexam filed before FWD because “the petitioner does not maintain the [reexam] proceeding” and §315(e)’s estoppel provision is “inapplicable against the Patent Office to ongoing *ex parte* reexamination proceedings”).

Petitioner filed its reexam request just before the FWD issued in an attempt to avoid estoppel and not be bound by the results of this IPR. *Infra* §II.B.5. The Director should terminate the reexam to preserve the estoppel provision’s core purpose—holding Petitioner to the results of the FWD in the IPR that Petitioner sought. If Petitioner’s reexam is not terminated, that would encourage future petitioners to follow the same playbook under which they would gain the benefit of a full IPR trial on their preferred grounds and then file a reexam request on the eve of the FWD as a hedge. That is not how the system should operate.

Petitioner will say they have complied with the letter of Section 315(e), under which they were not estopped from filing their reexam request before the FWD issues. But this scenario is covered by the statute’s *preceding* subsection (Section 315(d)), which grants the Director the discretion to terminate the reexam proceeding filed during the pendency of this IPR. *Supra* §II.A.

5. The Petitioner’s Intentional Delay and Gamesmanship Warrant the Director Exercising His Discretion to Terminate the Reexam

The timing of Petitioner’s reexam request reeks of gamesmanship. The

Board issued its FWD in IPR2024-01447—a case in which oral hearing was held on the same day as in this IPR—on Friday March 27, 2026, more than three weeks before it was due. This spurred Petitioner into action. Petitioner did not wait even a single business day before filing the reexam Request on the following *Sunday*. The unusual Sunday filing suggests Petitioner had the reexam Request ready to file and was waiting until just before the FWD was about to issue to give Patent Owner and the Board little time to address termination of the reexam. In its Opposition to Petitioner’s Motion (Paper 55), Petitioner never denied that it had its reexam Request ready to go and was waiting to file it (Paper 56, 3). That gamesmanship should not be rewarded. Given that Petitioner has known about the prior art used in its reexam request for more than a year (*supra* §II.B.2), there is no justification for Petitioner to have waited until the eve of the FWD to file it.

III. CONCLUSION

To maintain the viability of Section 315(e)’s estoppel provision, the Director should terminate the reexam under Section 315(d).

Respectfully submitted,
Godo Kaisha IP Bridge 1

Date: April 28, 2026

By: /Richard Giunta /
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WOLF, GREENFIELD & SACKS, P.C.

CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6 (e)(4)

I certify that on April 28, 2026, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Petitioner, upon the following:

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