

Beamer, Norman

From: Trials
Sent: Thursday, January 30, 2025 8:58 AM
To: Sarwar, Turhan F.; Peter Knops; Kayvan Noroozi; PTAB Scott McKeown; PTAB Anant Saraswat; DiMarco, Libbie A.; PTAB Turhan Sarwar
Cc: Trials
Subject: RE: IPR2025-00003 | Google LLC and Lenovo (United States) Inc. v. Ericsson AB | Petitioner's Request for Reply to Patent Owner's Preliminary Response

Counsel,

Petitioner is authorized to file a 5-page Reply within one week directed to the topics set forth below, and Patent Owner may file a 5-page Sur-Reply within one week of service of the Reply.

Regards,

Tina Lee
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Sarwar, Turhan F. <Turhan.Sarwar@WolfGreenfield.com>
Sent: Wednesday, January 29, 2025 4:47 PM
To: Trials <Trials@USPTO.GOV>
Cc: Peter Knops <peter@noroozipc.com>; Kayvan Noroozi <kayvan@noroozipc.com>; PTAB Scott McKeown <SMcKeown-PTAB@WolfGreenfield.com>; PTAB Anant Saraswat <ASaraswat-PTAB@WolfGreenfield.com>; DiMarco, Libbie A. <Elizabeth.DiMarco@WolfGreenfield.com>; PTAB Turhan Sarwar <TSarwar-PTAB@wolfgreenfield.com>
Subject: IPR2025-00003 | Google LLC and Lenovo (United States) Inc. v. Ericsson AB | Petitioner's Request for Reply to Patent Owner's Preliminary Response

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Trials,

Petitioners seek authorization for a 5-page Reply to: (1) address unforeseeable arguments in the POPR that contradict positions PO took in ITC Case No. 337-TA-1376; and (2) explain the relevance of the ITC Administrative Law Judge's intervening Final Initial Determination of November 15, 2024, which issued after the above-captioned Petition was filed and directly addresses the POPR arguments. The Final Initial Determination was affirmed by the ITC without any challenge from PO regarding the invalidity findings.

Petitioners specifically wish to address:

- PO's argument pertaining to the scope of the "detect" term as being limited to the "discovery of information" that is "partly hidden or not clear"—a contradiction with PO's ITC position that a client "detect[s]" a boundary merely by "encountering" a header in a media stream.
- PO's argument pertaining to Peterka's bit signaling. The POPR argues that "Peterka's teachings regarding its bit signaling" are "'exclusive' to its push model"—a position that contradicts PO's position during trial, where PO did not dispute that Peterka discloses a client that both "issu[es] requests" for a new key "ahead of a key

rotation boundary” and “detect[s] content encryption key rotation boundaries” by checking a predetermined bit in a packet.

Petitioners do not oppose a Patent Owner Sur-Reply of equal length (5 pages) responding to Petitioners’ Reply.

Patent Owner does not oppose Petitioners’ request.

Petitioners propose its filing be due one week from any Order of the Board.



Turhan F. Sarwar

he/him/his

Counsel

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