

From: [Trials](#)
To: [Fletcher, Thomas](#); [Trials](#)
Cc: [DG-Goodwin-Tecan](#); [IDT-Tecan-IPRs](#)
Subject: RE: IPR2025-00015 and IPR2025-00016
Date: Tuesday, July 29, 2025 2:31:41 PM

Counsel,

Petitioner's request for authorization to file a motion to disqualify Dr. Matz and submit *in camera* exhibits in support of the motion is granted. Petitioner is authorized to file a 10-page motion, as well as the supporting exhibits, by August 6, 2025.

Patent Owner may file a 10-page opposition to Petitioner's motion by August 14, 2025.

No reply is authorized at this time.

No conference is necessary at this time.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
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(571) 272-5366

From: Fletcher, Thomas <TFletcher@wc.com>
Sent: Tuesday, July 29, 2025 1:16 PM
To: Trials <Trials@USPTO.GOV>
Cc: DG-Goodwin-Tecan <DG-GoodwinTecan@goodwinlaw.com>; IDT-Tecan-IPRs <IDT-Tecan-IPRs@wc.com>
Subject: IPR2025-00015 and IPR2025-00016

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Dear Honorable Board,

On July 18, Patent Owner filed a declaration from Dr. Mikhail Matz, Ex. 2039, in support of its Patent Owner Responses in IPR2025-00015 and IPR2025-00016. Petitioner objects to Dr. Matz's declaration due to an alleged conflict of interest (IPR2025-00015, Paper 25; IPR2025-00016, Paper 23) and seeks authorization to

file two motions.

1. Petitioner seeks authorization to file a motion seeking to disqualify Dr. Matz. The parties conferred about this issue telephonically on July 25, 2025, and Patent Owner will oppose the motion.
2. Petitioner seeks authorization to submit *in camera* certain exhibits in support of the foregoing motion, specifically, exhibits memorializing the scope and subject matter of the confidential relationship between Dr. Matz and Petitioner's counsel. The parties conferred about this issue telephonically on July 25, 2025, and Patent Owner will oppose the request to the extent Patent Owner does not have notice of the information being relied upon and an opportunity to be heard on the merits of the arguments.

The parties are available at the following times:

- Monday, August 4, 10 am – 1 pm and 4-5 pm,
- Wednesday, August 6, 10 am -12 pm and 2-5 pm
- Thursday, August 7, 10 am – 12:30 pm; 4 pm – 5 pm.

Counsel for Patent Owner are copied on this email.

Respectfully submitted,

Thomas S. Fletcher
Lead counsel for Petitioner

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