

From: Trials <Trials@USPTO.GOV>
Sent: Friday, February 28, 2025 3:40 PM
To: Trials <Trials@USPTO.GOV>; Douglas, Christopher <Christopher.Douglas@alston.com>
Cc: Pegasus_IPR <bdip-pegasus_ipr@bdiplaw.com>; James Wilson <jwilson@bdiplaw.com>; Elliot B. Robinson <erobinson@bdiplaw.com>; Pegasus-IPRs <Pegasus-IPRs@alston.com>
Subject: RE: Unopposed Request for Authorization for Preliminary Reply, IPR2025-00037 (932 Patent), Nokia of America Corp. et al. v. Pegasus Wireless Innovation LLC

CORRECTION: We also authorize Patent Owner to file a preliminary sur-reply limited to five pages and it must be filed by March 28, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Trials <Trials@USPTO.GOV>
Sent: Friday, February 28, 2025 3:32 PM
To: Douglas, Christopher <Christopher.Douglas@alston.com>; Trials <Trials@USPTO.GOV>
Cc: Pegasus_IPR <bdip-pegasus_ipr@bdiplaw.com>; James Wilson <jwilson@bdiplaw.com>; Elliot B. Robinson <erobinson@bdiplaw.com>; Pegasus-IPRs <Pegasus-IPRs@alston.com>
Subject: RE: Unopposed Request for Authorization for Preliminary Reply, IPR2025-00037 (932 Patent), Nokia of America Corp. et al. v. Pegasus Wireless Innovation LLC

Counsel,

Petitioner requests authorization to file a preliminary reply limited to addressing (1) the constructions of the claim phrases “radio bearer identification information” and “distinguish signaling radio bearers” (see claim 1 of U.S. Patent 10,616,032 B2 (Ex. 1001)), “(2) Patent Owner’s arguments related to Fintiv as discussed at POPR pgs. 24-42, and (3) entering a stipulation to address any overlap between the invalidity grounds in the district court case and those that were included in the IPR.” The request unopposed.

We authorize Petitioner to file a preliminary reply on the topics indicated above limited to 5 pages. The preliminary reply must be filed by March 14, 2025.

We also authorize Patent Owner to file a preliminary sur-reply limited to five pages and it must be filed by March 24, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
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From: Douglas, Christopher <Christopher.Douglas@alston.com>
Sent: Thursday, February 27, 2025 2:53 PM
To: Trials <Trials@USPTO.GOV>
Cc: Pegasus_IPR <bdip-pegasus_ipr@bdiplaw.com>; James Wilson <jwilson@bdiplaw.com>;
Elliot B. Robinson <erobinson@bdiplaw.com>; Pegasus-IPRs <Pegasus-IPRs@alston.com>
Subject: Unopposed Request for Authorization for Preliminary Reply, IPR2025-00037 (932 Patent), Nokia of America Corp. et al. v. Pegasus Wireless Innovation LLC

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Dear Honorable Board,

Petitioner respectfully requests authorization to file a preliminary reply limited to: (1) Patent Owner's unforeseeable constructions of the phrase "radio bearer identification information" at, for example, POPR pgs. 9-12 and 16-23 and the phrase "distinguish signaling radio bearers" at, for example, pgs. 10-11, 17, and 21-23, (2) Patent Owner's arguments related to *Fintiv* as discussed at POPR pgs. 24-42, and (3) entering a stipulation to address any overlap between the invalidity grounds in the district court case and those that were included in the IPR. Petitioner requests a 5-page preliminary reply and requests a filing deadline of within two weeks of receiving authorization.

Patent Owner denies that the topics in Petitioner's paragraph above were unforeseeable, but requests a preliminary sur-reply of equal length that is limited to the issues raised in the preliminary reply. Due to existing workload constraints, Patent Owner respectfully requests that the deadline for its sur-reply be the later of two weeks after the filing of the preliminary reply being filed or March 24.

The Parties conferred telephonically and do not oppose these requests.

Respectfully,

Chris

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