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Cc: [PH-Google-Multifold-IPR](#); [Higgins, Christopher J.](#); [Multifold IPRs](#); [Carmichael, Jim \(External\)](#); [Mitch Yang](#); [Steve Schreiner](#)
Subject: IPR2025-00040, Petitioners' Request for Leave to Submit Responsive Brief
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Dear Honorable Board:

Petitioners in IPR2025-00040 request leave to file a responsive brief of up to five pages addressing new arguments first raised by Patent Owner in its sur-reply brief in this proceeding. Specifically, the proposed responsive brief would address Patent Owner's claim construction argument that "Claim 1 recites a specific order of steps that must be performed in the order written" and the argument that "[n]one of the Petitioners' art meets the order required by claim 1." *See* Sur-reply (Paper No. 22) at p. 3-13.

Petitioners contacted Patent Owner to seek Patent Owner's position. Patent Owner provided its position as follows: "Patent Owner opposes Petitioners' request because it is outside the scope of this proceeding. Patent Owner argues a limitation that was omitted from the Petition. Patent Owner opposes the request because Petitioners waived any argument against a limitation if that limitation was not challenged in the Petition."

Respectfully submitted,

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