

From: [Trials](#)
To: [Abdelnour, Dennis J.](#); [Kappers, Robert](#); [SJ AAM Team](#); [Huget, J. Michael](#); [Waidelich, Sarah E.](#); [Fatabhoy, Yafeez S.](#); [Thomas, David J.](#)
Cc: [Trials](#)
Subject: RE: American Axle v. Neapco, IPR2025-00090, IPR2025-00091 - Request for Leave to File Reply to POPR
Date: Tuesday, April 8, 2025 12:16:39 PM
Attachments: [image001.png](#)

Counsel,

The Board will take Petitioner's request under advisement. At the present time, further briefing is not authorized. If the panel assigned to this case concludes further briefing might be helpful to resolve the issues presented, then a conference call with counsel will be scheduled.

Regards,

Franchesca I. Alicea Villanueva
Supervisory Paralegal
Patent Trial & Appeal Board
U.S. Patent & Trademark Office

From: Abdelnour, Dennis J. <DAbdelnour@honigman.com>
Sent: Monday, April 7, 2025 6:57 PM
To: Kappers, Robert <rkappers@steptoe.com>; Trials <Trials@USPTO.GOV>
Cc: SJ AAM Team <sjaamteam@Steptoe.com>; Huget, J. Michael <MHuget@honigman.com>; Waidelich, Sarah E. <SWaidelich@honigman.com>; Fatabhoy, Yafeez S. <YFatabhoy@honigman.com>; Thomas, David J. <DThomas@honigman.com>
Subject: RE: American Axle v. Neapco, IPR2025-00090, IPR2025-00091 - Request for Leave to File Reply to POPR

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Board:

Patent Owner seeks to clarify the note below. Patent Owner conferred with Petitioner by email and conveyed that it was only available on 4/11 at any time after 2pm ET this week. Patent Owner is not available on 4/8 or 4/9, and wanted to make sure that the Board was aware of that as it was considering the request below.

Best regards,

Dennis Abdelnour

Ex. 3001
IPR2025-00090
IPR2025-00091

Dennis J. Abdelnour

HONIGMAN LLP

O [312.701.9348](tel:312.701.9348)

M [202.441.1504](tel:202.441.1504)

dabdelnour@honigman.com

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please delete it and notify the sender of the error.

From: Kappers, Robert <rkappers@steptoe.com>

Sent: Monday, April 7, 2025 5:21 PM

To: Trials@uspto.gov

Cc: SJ AAM Team <sjaamteam@steptoe.com>; Huget, J. Michael <MHuget@honigman.com>;

Waidelich, Sarah E. <SWaidelich@honigman.com>; Fatabhoy, Yafeez S.

<YFatabhoy@honigman.com>; Thomas, David J. <DThomas@honigman.com>; Abdelnour, Dennis J.

<DAbdelnour@honigman.com>

Subject: American Axle v. Neapco, IPR2025-00090, IPR2025-00091 - Request for Leave to File Reply to POPR

[EXTERNAL EMAIL]

IPR2025-00090

Patent No. 11,434,958

Petitioner: American Axle & Manufacturing, Inc.

Patent Owner: Neapco Components LLC

IPR2025-00091

Patent No. 11,598,376

Petitioner: American Axle & Manufacturing, Inc.

Patent Owner: Neapco Components LLC

Dear Board,

Petitioner seeks leave under 37 C.F.R. 42.108(c) to file a 5-page Reply to Patent Owner's Patent Owner Preliminary Responses in each of the above-captioned IPRs limited to the issue of whether Petitioner's Exhibit 1013 (the 2016 Jeep® Renegade service manual) qualifies as a printed publication, and to file the declarations of FCA US LLC and Todd Harris in support of its Replies. Patent Owner opposes Petitioner's request.

Petitioner believes good cause exists to file these Replies and declarations. Patent Owner contends Petitioner cannot establish good cause under the circumstances.

Counsel for Petitioner and Patent Owner are available for a teleconference. Petitioner provides the

following availability for a teleconference: 4/8 at any time after 3pm ET, 4/9 at any time, or 4/11 at any time. Patent Owner provides the following availability for a teleconference: 4/11 at any time after 2pm ET, or at a mutually-agreeable time the following week and at the Board's availability.

Respectfully submitted,

Robert Kappers
Counsel for Petitioner

Robert F. Kappers

Partner

Step toe

Step toe LLP | 227 West Monroe Street Suite 4700 | Chicago, IL 60606

[+1 312 577 1254](tel:+13125771254) direct | [+1 937 405 8133](tel:+19374058133) mobile | rkappers@step toe.com | www.step toe.com | [Step toe Bio](#)

This message and any attached documents contain information from the law firm Step toe LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.