From:	Kappers, Robert
Sent:	Friday, April 4, 2025 9:13 AM
To:	Huget, J. Michael; Abdelnour, Dennis J.; Waidelich, Sarah E.; Fatabhoy, Yafeez S.; DThomas@honigman.com
Cc:	SJ AAM Team
Subject:	American Axle v. Neapco, IPR2025-00090, IPR2025-00091 - Request for Leave to File Reply to POPR
Attachments:	4-2-2025 Laidlaw Declaration.pdf; 3-26-2025 - Harris Declaration.pdf

Counsel,

American Axle intends to seek leave of the Board under 37 C.F.R. 42.108(c) to file a 5-page Reply to each of Neapco's Patent Owner Preliminary Responses and submit the attached supporting declarations from FCA US LLC and Todd Harris. Good cause exists at least because, (i) despite its diligence, American Axle was unable to present this declaration testimony in its petitions, (ii) Neapco raised arguments in its Patent Owner Preliminary Response that were not reasonably foreseeable to American Axle, including that FCA (formerly, Chrysler) restricted access to the 2016 Jeep® Renegade manual to FCA and its service network and that the contents of the CD of Exhibit 1013 may differ from the contents of CDs sold and offered for sale before the effective filing date, and (iii) American Axle's Replies and supporting declarations will assist the Board in determining the dispositive issue of whether the 2016 Jeep® Renegade manual is a printed publication. *See, e.g.*, *Hulu LLC v. Sound View Innovations*, IPR2018-01039, Paper 29 at 14 (PTAB Dec. 20, 2019) (precedential).

We assume Neapco will oppose our request, but please confirm and provide your availability for a teleconference with the Board next week. Below is the email we intend to send Trials@uspto.gov.

Best,
Robert

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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. Petitioner believes good cause exists to file these Replies and declarations. Patent Owner opposes Petitioner's request.

Counsel for Petitioner and Patent Owner are available for a teleconference on 4/7, 4/9, or 4/11 at any time.

Respectfully submitted,

Robert Kappers
Counsel for Petitioner

Robert F. Kappers
Partner

Steptoe

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American Axle v. Neapco - IPR2025-00091
PET_ AAM_1045-0002