

From: [Trials](#)
To: [Weidenfeller, Scott](#); [Trials](#)
Cc: [McCarthy, Alison L.](#); [Ferzacca, Dustin N.](#); [Zappia, Andrew P.](#); [Garr, David](#); [Ahn, Alice](#); [Samsung-SiOnyx-IPR-Cov](#)
Subject: RE: IPR2025-00161: request for preliminary reply
Date: Thursday, April 3, 2025 11:23:09 AM
Attachments: [image001.png](#)

Counsel,

The panel authorizes Petitioner to file a Preliminary Reply of up to five pages in IPR2025-00161. The Reply may address the matters outlined in the email of March 21, 2025. Petitioner may, if necessary, file additional exhibits related to the ITC proceeding, but Petitioner should not incorporate any arguments by reference. Petitioner's Preliminary Reply shall be due April 10, 2025.

The panel authorizes Patent Owner to file a Preliminary Sur-reply of up to five pages in the above-captioned proceeding. Patent Owner may similarly file additional exhibits related to the ITC proceeding if necessary. The Preliminary Sur-Reply to shall be due April 17, 2025.

Regards,

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

From: Weidenfeller, Scott <SWeidenfeller@cov.com>
Sent: Wednesday, April 2, 2025 3:01 PM
To: Trials <Trials@USPTO.GOV>
Cc: McCarthy, Alison L. <Alison.McCarthy@troutman.com>; Ferzacca, Dustin N. <Dustin.Ferzacca@troutman.com>; Zappia, Andrew P. <Andrew.Zappia@troutman.com>; Garr, David <dgarr@cov.com>; Ahn, Alice <aahn@cov.com>; Samsung-SiOnyx-IPR-Cov <Samsung-SiOnyx-IPR-Cov@cov.com>
Subject: RE: IPR2025-00161: request for preliminary reply

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

Dear Honorable Board,

Petitioner respectfully writes to follow up on the unopposed request set forth in our prior email below, concerning preliminary briefing in IPR2025-00161.

Respectfully submitted,

Scott Weidenfeller
Counsel for Petitioner

From: Weidenfeller, Scott

Sent: Friday, March 21, 2025 3:21 PM

To: trials@uspto.gov

Cc: McCarthy, Alison L. <Alison.McCarthy@troutman.com>; Ferzacca, Dustin N.

<Dustin.Ferzacca@troutman.com>; Zappia, Andrew P. <Andrew.Zappia@troutman.com>; Garr,

David <dgarr@cov.com>; Ahn, Alice <aahn@cov.com>; Samsung-SiOnyx-IPR-Cov <Samsung-SiOnyx-IPR-Cov@cov.com>

Subject: IPR2025-00161: request for preliminary reply

Dear Honorable Board:

Petitioner in the above-referenced IPR respectfully requests authorization to file a five-page preliminary reply to address Patent Owner's arguments on discretionary denial under 35 U.S.C. § 314(a), as well as Patent Owner's arguments for how "pixel" should be interpreted in light of the ITC *Markman* proceedings.

Patent Owner has advised that it consents, provided Patent Owner may have leave to file a four-page sur-reply. Petitioner does not oppose Patent Owner's request for a sur-reply.

The parties are available for a call with the Board next week, if needed, between 9:30 and noon ET on Wednesday or Thursday.

Respectfully submitted,

Scott Weidenfeller
Counsel for Petitioner

Scott Weidenfeller

Covington & Burling LLP
One CityCenter, 850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5923 | sweidenfeller@cov.com
www.cov.com

COVINGTON