

From: [Director_PTABDecision_Review](#)
To: ["Greg Gulliver"; Director_PTABDecision_Review; Paul Hart; Adam Seitz; ptab@eriseip.com; Meredith Addy; robert@addyhart.com; Sue Tucker](#)
Subject: RE: IPR2025-00172 - Patent Owner's Request for permission to file Reply
Date: Tuesday, July 29, 2025 1:16:00 PM

Counsel,

Patent Owner's request for authorization to file a Reply with regard to Patent Owner's Request for Director Review in the above-identified proceeding is denied.

Thanks.

IPR2025-000172
Ex. 3101

From: Greg Gulliver <gbgulliver@addyhart.com>
Sent: Wednesday, July 23, 2025 3:09 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Paul Hart <paul.hart@eriseip.com>; Adam Seitz <adam.seitz@eriseip.com>; ptab@eriseip.com
Cc: Meredith Addy <meredith@addyhart.com>; robert@addyhart.com; Greg Gulliver <gbgulliver@addyhart.com>; Sue Tucker <sue@addyhart.com>
Subject: IPR2025-00172 - Patent Owner's Request for permission to file Reply

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Honorable Director:

Patent Owner request permission to file a three-page Director's Review Request Reply to address the issue of waiver and the corrected translation certificate raised by the Petitioner. Patent Owner also proposes the Petitioner be given a three-page Sur-Reply. The waiver issue was raised in the Petitioner's Response, and the Patent Owner needs to respond to the Petitioner's assertions. Similarly, the Petitioner asserts that a corrected translation certificate was filed in the IPR and cured the issue; however, the Patent Owner never brought up the corrected translation certificate raised in the Response. Issues with the filed translation certificate needs to be addressed by the Patent Owner in the Reply.

The Petitioner has indicated that it opposes this request and has asked to include the following response: No further briefing is merited on this record. The Director Review Request addressed (1) the Office's finding that discretionary arguments were waived and (2) the Interim Processes Memo. Petitioner's Response simply explained why the Office was correct and how Patent Owner misinterpreted the Interim Processes Memo. No new issues were introduced. Regarding the translation, Petitioner's Response observed that Patent Owner's Director Review Request did not dispute whether Petitioner had in fact cured the issue and was instead challenging the Board having granted Petitioner permission to cure the issue. Framing the dispute for the Board does not justify additional briefing.

The parties are available for a call with the Board, if so desired, on:

7/24/2025 10:00am, 1:00pm (all times are EST)

7/28/2025 1:30pm

Kind Regards,

Gregory B. Gulliver

Reg. No. 44138

Attorney for Patent Owner



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