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Subject: RØDE Microphones, LLC, et al. v. Zaxcom, Inc., IPR2025-00230, 00231, and 00232 - request re leave to file pre-institution Replies
Date: Thursday, April 3, 2025 5:03:51 PM

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To the Board:

Petitioners RØDE Microphones, LLC and Freedman Electronics Pty Ltd. ("Petitioners" or "RØDE") request authorization to move for leave to file a 7-page Reply to the Patent Owner's Preliminary Response ("POPR") in each of the above-referenced cases, in order to address the following issues raised in the POPRs:

1. Construction of "master timecode" and "master timecode generator," and relatedly, the application of collateral estoppel in view of Zaxcom's construction, and the presence of such features in the prior art in view of said construction; and
2. Construction of "locally generated audio," and relatedly, the application of collateral estoppel in view of Zaxcom's construction, and the presence of such features in the prior art in view of said construction.

RØDE proposes April 30, 2025 as the deadline for the Replies.

Patent Owner Zaxcom, Inc. opposes RØDE's request. The parties have met and conferred on the matter but have been unable to reach agreement.

The parties are available for a teleconference with the Board to discuss RØDE's request at the following times:

- Tuesday, April 8: noon – 5:00 pm ET
- Wednesday, April 9: 12:30-5:00 pm ET

Regards,

Michael A. Fisher
Counsel for Petitioners RØDE Microphones, LLC and Freedman Electronics Pty Ltd.

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