

Brandon Moore

From: Yung-Hoon (Sam) Ha <YHa@desmaraisllp.com>
Sent: Thursday, April 17, 2025 5:32 PM
To: Trials
Cc: Taeg Sang (Tim) Cho; Laura Avena; YuKai Bao; Joze Welsh; DG-Sinotechnix; David DeZern; Brandon Moore; Samsung-Sinotechnix-IPR
Subject: RE: IPR2025-00331, -00332, -00333, -00335, and -00336

Dear Honorable Board,

Further to our email below dated March 19, 2025 and in light of today's (April 17, 2025's) PTAB Boardside Chat, which clarified that a *Sotera* stipulation should be filed within one month of the Notice of Filing Date Accorded, Petitioner follows up on the portion of the request below requesting Board's permission to submit a *Sotera* stipulation in the following proceedings.

- IPR2025-00335 (regarding Patent No. 8,132,952), filed January 6, 2025, and accorded a notice of filing date of March 6, 2025;
- IPR2025-00333 (regarding Patent No. 7,748,873), filed January 15, 2025, and accorded a notice of filing date of March 6, 2025;
- IPR2025-00336 (regarding Patent No. 7,901,113), filed January 17, 2025, and accorded a notice of filing date of March 6, 2025;
- IPR2025-00331 (regarding Patent No. 7,618,162), filed January 27, 2025, and accorded a notice of filing date of March 6, 2025; and
- IPR2025-00332 (regarding Patent No. 7,951,626), filed February 13, 2025, and accorded a notice of filing date of April 11, 2025.

Respectfully,

Yung-Hoon Ha for Petitioner

From: Yung-Hoon (Sam) Ha
Sent: Wednesday, March 19, 2025 9:21 AM
To: Trials <Trials@USPTO.GOV>
Cc: Taeg Sang (Tim) Cho <TCho@desmaraisllp.com>; Laura Avena <LAvena@desmaraisllp.com>; YuKai Bao <YBao@desmaraisllp.com>; Joze Welsh <JWelsh@desmaraisllp.com>; Yung-Hoon (Sam) Ha <YHa@desmaraisllp.com>; DG-Sinotechnix <Sinotechnix@nelbum.com>; David DeZern <david@nelbum.com>; brandon@nelbum.com; Samsung-Sinotechnix-IPR <Samsung-Sinotechnix-IPR@desmaraisllp.com>
Subject: IPR2025-00331, -00332, -00333, -00335, and -00336

Dear Honorable Board,

Petitioner requests the Board's permission to submit briefing limited to three pages in each of the following IPRs in light of the Office's decision to rescind Director Vidal's 2022 memorandum on discretionary denials on February 28, 2025. Specifically, Petitioner seeks to: (1) update the stipulations filed in the following petitions to *Sotera* stipulations; and (2) provide updated briefing regarding the

analysis of the *Fintiv* factors. Petitioner believes that updating the stipulations and *Fintiv* analysis in the following IPR petitions will provide the Board with the most complete and accurate record for the Board's consideration.

- IPR2025-00335 (regarding Patent No. 8,132,952), filed January 6, 2025;
- IPR2025-00333 (regarding Patent No. 7,748,873), filed January 15, 2025;
- IPR2025-00336 (regarding Patent No. 7,901,113), filed January 17, 2025;
- IPR2025-00331 (regarding Patent No. 7,618,162), filed January 27, 2025; and
- IPR2025-00332 (regarding Patent No. 7,951,626), filed February 13, 2025.

Should a call be needed, Petitioner and Patent Owner are available in the following times:

- March 26, 10am-2pm, 4-5pm ET; and
- March 28, 12pm-5pm ET.

Petitioner has conferred with Patent Owner's counsel and Patent Owner opposes the request.

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