

From: [Marc Vander Tuig](#)
To: [Trials](#); [O'Dell, David M.](#)
Cc: [Richard L. Brophy](#); [Michael J. Vander Molen](#); [Shi, Hong](#); [Lyle, Kelly Gehrke](#); [Michelson, Greg](#); [Sydney K. Johnson](#)
Subject: RE: Questions regarding PGR-00016 (USP 12,098,063) and IPR2025-00381 (USP 11,465,891) [IMAN-IDOCS.31681.739.FID5692618]
Date: Tuesday, May 13, 2025 4:36:23 PM

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Dear Mr. Kellogg:

Patent Owner did not submit briefing relating to the construction of “mainframe” in IPR2025-00381 because none of the challenged claims in U.S. Patent No. 11,465,891 include the term “mainframe.”

Please let us know if you have any questions or would like any additional information.

Best regards,

Marc Vander Tuig



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From: Trials <Trials@USPTO.GOV>
Sent: Monday, May 12, 2025 3:54 PM
To: Trials <Trials@USPTO.GOV>; O'Dell, David M. <David.Odell@haynesboone.com>
Cc: Richard L. Brophy <RBrophy@atllp.com>; Michael J. Vander Molen <mvandermolen@atllp.com>; Marc Vander Tuig <MVanderTuig@atllp.com>; Shi, Hong <Hong.Shi@haynesboone.com>; Lyle, Kelly Gehrke <Kelly.Lyle@haynesboone.com>; Michelson, Greg <Greg.Michelson@haynesboone.com>
Subject: RE: Questions regarding PGR-00016 (USP 12,098,063) and IPR2025-00381 (USP 11,465,891)

CAUTION: EXTERNAL EMAIL

Counsel:

Based on a joint request, the panel authorized both parties to file in IPR2025-00381 and PGR2025-00016, substantially similar versions of the initial and reply briefing from IPR2025-00167 through -00171 on the construction of “mainframe.” Petitioner filed its briefing in both proceedings, but Patent Owner filed its briefing only in PGR2025-00016.

The parties should meet and confer on this issue and respond to this email by 5pm ET on May 13, 2025, as to whether Petitioner objects to Patent Owner filing out of time the authorized briefs in IPR2025-00381. If Petitioner does not object, Patent Owner should file the briefs in IPR2025-00381 by 5pm ET on May 14, 2025.

Regards,

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

From: Trials <Trials@USPTO.GOV>

Sent: Monday, May 5, 2025 3:44 PM

To: O'Dell, David M. <David.Odell@haynesboone.com>; Trials <Trials@USPTO.GOV>

Cc: rbrophy@atllp.com; mvandermolen@atllp.com; mvandertuig@atllp.com; Shi, Hong <Hong.Shi@haynesboone.com>; Lyle, Kelly Gehrke <Kelly.Lyle@haynesboone.com>; Michelson, Greg <Greg.Michelson@haynesboone.com>

Subject: RE: Questions regarding PGR-00016 (USP 12,098,063) and IPR2025-00381 (USP 11,465,891)

Counsel:

The parties in PGR2025-00016 and IPR2025-00381 are authorized to file, in each proceeding (1) the identical briefs as filed in IPR2025-00167 through -00171 (except for minor ministerial differences) on the construction of the term “mainframe” and (2) a copy of the District Court’s stay order.

All of the filings authorized above must occur on or before 5pm ET on May 9, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials

Patent Trial and Appeal Board
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From: O'Dell, David M. <David.Odell@haynesboone.com>
Sent: Thursday, May 1, 2025 5:37 PM
To: Trials <Trials@USPTO.GOV>
Cc: rbrophy@atllp.com; mvandermolen@atllp.com; mvandertuig@atllp.com; Shi, Hong <Hong.Shi@haynesboone.com>; Lyle, Kelly Gehrke <Kelly.Lyle@haynesboone.com>; Michelson, Greg <Greg.Michelson@haynesboone.com>
Subject: Questions regarding PGR-00016 (USP 12,098,063) and IPR2025-00381 (USP 11,465,891)

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We recently received Notices: Referral to Board Panel for the above-two Patent Trial matters. We want the records to be complete when the Board takes these matters up for consideration, and have the following two questions:

1. These two matters are the last two members of a family of seven IPR/PGR petitions based on a common specification, as listed in the table below. In the first five IPR matters in this table, the Board has asked for briefing regarding a specific claim term: mainframe. For the sake of completeness, should we request leave to submit the identical briefs in the last two family members (PGR-00016 and IPR2025-00381)? Or does the Office automatically provide those briefs across the entire family?

Patent Number	Proceeding No.
9,321,386	IPR2025-00167
	IPR2025-00168
	IPR2025-00169
9,975,750	IPR2025-00170
10,202,266	IPR2025-00171
11,465,891	IPR2025-00381
12,098,063	PGR2025-00016

2. These seven patents are in a common litigation, in which the District Court has stayed the case pending the output of the IPR/PGRs. Copies of this stay order have been provided in the first five patent trials, but not the last two (PGR-00016 and IPR2025-00381. For the sake of completeness, should we file copies of the stay order in these

last two patent trials?

HAYNES BOONE

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