

Filed May 27, 2025

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EUNSUNG GLOBAL CORP.,

Petitioner,

v.

HYDRAFACIAL LLC,

Patent Owner.

Case No. IPR2025-00452

U.S. Patent No. 12,053,607

**BRIEF IN SUPPORT OF PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL**

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I. INTRODUCTION

Pursuant to the Acting Director’s Memorandum *Interim Processes for PTAB Workload Management* (“Memorandum”) issued on March 26, 2025, Patent Owner HydraFacial LLC (“HydraFacial” or “Patent Owner”) sets forth the bases on which the Director should exercise discretion to deny institution of this IPR. This filing is timely, submitted within one month of the Notice Extending Deadline for Discretion Briefing, dated April 24, 2025. Paper 7. The following independent bases support denying institution, and together they weigh strongly in favor of exercising discretion to deny institution.

First, denial is warranted under 35 U.S.C. § 325(d) because the Petition merely rehashes the same or substantially similar prior art or arguments that were previously considered by the Patent Office. The Examiner already considered Karasiuk—Eunsung’s primary reference for Grounds 1A-1D—and Greenberg—Eunsung’s primary reference for Grounds 2A-2D—during prosecution of the ’607 Patent. Eunsung also relies on other prior art that was either already reviewed by the Examiner or is not materially different from what was previously considered. Further, the Director should reject the Petition because Eunsung cannot identify an error in the Examiner’s analysis.

Second, the merits of the Petition are weak and strongly support discretionary denial. Although HydraFacial will fully address the merits in its Patent Owner’s

Preliminary Response (POPR) and demonstrate that Eunsung has not met its burden for institution, the Director should discretionarily deny the Petition now because the prior art relied on in the Petition does not disclose all claim limitations.

For these reasons, and as detailed further below, the Director should exercise her discretion to deny institution.

II. BASES FOR DISCRETIONARY DENIAL

A. The Director Should Deny the Petition Under 325(d)

Section 325(d) authorizes the Director to reject the Petition when “the same or substantially the same prior art or arguments previously were presented to the Office.” 35 U.S.C. § 325(d). In *Advanced Bionics*, the Board explained its two-part framework for deciding whether to deny institution under Section 325(d):

Thus, under § 325(d), the Board uses the following two-part framework: (1) whether the same or substantially the same art previously was presented to the Office or whether the same or substantially the same arguments previously were presented to the Office; and (2) if either condition of [the] first part of the framework is satisfied, whether the petitioner has demonstrated that the Office erred in a manner material to the patentability of challenged claims. If a condition in the first part of the framework is satisfied and the petitioner fails to make a showing of material error, the Director generally will exercise discretion not to institute *inter partes* review. If reasonable minds can disagree regarding the purported treatment of art or arguments, it cannot be said that the Office erred in a manner material

to patentability. At bottom, this framework reflects a commitment to defer to previous Office evaluations of the evidence of record unless material error is shown.

Advanced Bionics, LLC v. Med-El Elektromedizinische Geräte GMBH, IPR2019-01469, Paper 6 at 8-9 (PTAB Feb. 13, 2020) (precedential).

The Board further explained that *Becton, Dickinson* factors (a), (b), and (d) provide insight into whether the same or substantially the same art or arguments was previously presented to the Office, and *Becton, Dickinson* factors (c), (e), and (f) provide insight into whether the petitioner has shown the Office materially erred. *Id.* at 10-11; *see Becton, Dickinson and Co. v. B. Braun Melsungen AG*, IPR2017-01586, Paper 8 at 17 (PTAB Dec. 15, 2017) (precedential).

Here, applying the *Becton, Dickinson* factors under the *Advanced Bionics* framework supports denial of the Petition under Section 325(d). Eunsung’s Petition relies on the exact same prior art—Karasiuk and Greenberg—previously presented to the Patent Office. Furthermore, Eunsung cannot show there was any material error in the Patent Office’s prior evaluation of the evidence. Thus, the Director should defer to the Patent Office’s prior evaluation and deny institution of the IPR. *Advanced Bionics*, Paper 6, at 9 (“At bottom, this framework reflects a commitment to defer to previous Office evaluations of the evidence of record unless material error is shown.”).

1. *Advanced Bionics*, Part 1 – The same or substantially same prior art was previously presented to the Patent Office

The Acting Director held in a precedential decision that “[c]hallenging the claims using the same prior art that was previously presented on an IDS is sufficient to satisfy the first part of the *Advanced Bionics* framework.” *Ecto World, LLC v. RAI Strategic Holdings, Inc.*, IPR2024-01280, Paper 13 at 4 (PTAB May 19, 2025) (precedential). Here, *Advanced Bionics*, Part 1 is readily satisfied because (1) Eunsung’s primary references, Karasiuk and Greenberg, were presented on an IDS and considered by the Examiner, and (2) Eunsung’s secondary references were either considered by the Examiner or are substantially the same as prior art previously considered by the Examiner.

Primary Reference: Karasiuk

In Grounds 1A-1D, the Petition relies on Karasiuk (Publ. No. 2003/0212415) (Ex. 1004) as the primary reference. Pet., 1. Karasiuk was listed on an IDS, and the Examiner certified that he considered it, as well as its patent grant (U.S. Pat. No. 7,658,742), its continuation child application publication and patent grant (Publ. No. 2007/0088371 and U.S. Pat. No. 7,951,156), and its continuation grandchild application publication (Publ. No. 2012/0136374). *See* Ex. 1002, 299-300, 311-313. Moreover, Karasiuk itself (Ex. 1004) was specifically identified in numerous search queries conducted by the Examiner. *See, e.g., id.*, 30, 34, 42, 45, 52, 60, 73 (showing

searches for “20030212415,” referring to Publ. No. 2003/0212415). Thus, because Karasiuk was previously presented on an IDS, the first part of the *Advanced Bionics* framework is met. *Ecto World*, Paper 13, at 4. Further, as explained below under *Advanced Bionics*, Part 2, the Examiner, Mr. Christian Knauss, was well aware of Karasiuk’s disclosure and thoroughly evaluated it during prosecution of a family member of the ’607 Patent.

Primary Reference: Greenberg

In Grounds 2A-2B, the Petition relies on Greenberg (Publ. No. 2003/0093089) (Ex. 1006) as the primary reference. Pet., 1. Greenberg was also listed on an IDS, and the Examiner certified that he considered it. *See* Ex. 1002, 311. Thus, the first part of the *Advanced Bionics* framework is met with respect to Greenberg. *Ecto World*, Paper 13, at 4. Further, as explained below under *Advanced Bionics*, Part 2, the Examiner, Mr. Christian Knauss, was well aware of Greenberg’s disclosure and thoroughly evaluated it during prosecution of a family member of the ’607 Patent.

Secondary References: Waldron, Palmer, Trueba

The Petition relies on Waldron as a secondary reference in Grounds 1B, 1D, 2B, and 2D. Waldron was listed on an IDS and the Examiner certified he considered it. *See* Ex. 1002, 295. Thus, Waldron satisfies *Advanced Bionics*, Part 1.

Eunsung contends that the Examiner did not consider secondary references Palmer or Trueba. Pet., 85. However, there are no material differences between the

relied-on teachings of Palmer and Trueba and the prior art the Examiner already considered. And to the extent Eunsung relies on any teachings of Palmer and Trueba that go beyond Karasiuk and Greenberg, such teachings are not as relevant as the prior art the Examiner already considered.

Eunsung relies on Palmer in conjunction with Karasiuk. *See* Pet., 7-13. Eunsung recognizes that Karasiuk lacks “a console configured to receive a first container containing a first treatment material and a second treatment material.” For this limitation, Eunsung turns to Palmer. *See* Pet., 6-7. However, Eunsung cannot plausibly allege that Palmer discloses multiple skin-treatment containers as claimed because Palmer discloses dental-irrigant containers. *See e.g.*, Ex. 1005, claim 1 (Palmer claiming a “[p]eriodontal irrigating system for delivering one of a plurality of liquid irrigating solutions to a treatment site in an oral cavity.”). Rather, Eunsung relies on Palmer more generally, as allegedly disclosing multiple treatment containers and container-selection structure. But that alleged disclosure is no more relevant than the disclosure of Coleman (Publ. No. 2001/0049511), which the Examiner applied during prosecution Ex. 1002, 169-172, 176-179. In fact, the Examiner described Coleman as follows:

Coleman teaches (Coleman, Figures 5A and 5B) a flow rate controller (59A) to adjust a flow rate of the first treatment material or the second treatment material to the handpiece (paragraph 0052), wherein the flow rate controller is located on the handpiece (50) or on the console; and a

user input device (59B) to select the first treatment material or the second treatment material for delivery to the handpiece (paragraph 0052).

Id., 172.

Coleman discloses (Figures 1-7) a skin treatment system, comprising: a console (Figure 6) configured to receive a first container (60C) containing a first treatment material (paragraph 0058) and a second container (60B) containing a second treatment material (paragraph 0058); a handpiece (Figures 5A and 5B) configured to couple to a tip (53/55) that can be placed against skin to perform skin treatment; a supply line (51 A) extending between the handpiece and the console for sequentially delivering treatment material to the handpiece from the first container or the second container (paragraphs 0059 and 0060)....

Id., 176.

Moreover, Coleman's system is more closely related to Karasiuk's system than Palmer's. Coleman is at least in the field of dermatological treatment (Ex. 1018, Abstract) rather than the field of dental irrigation. Coleman's system, like Karasiuk's, incorporates a vacuum source. Ex. 1018, [0020], [0050]. This vacuum pressure in Coleman draws waste from the skin to a container. *Id.* In contrast, Palmer's system merely uses a pump to push dental-irrigant from its containers. Ex. 1005, 5:10-22. But Coleman's system also includes a pump for dispensing treatment liquid from containers. Ex. 1018, [0059].

Thus, if it would have been obvious to combine Karasiuk with the disclosure of multiple treatment containers and container-selection structure to yield the claimed invention, the Examiner would have rejected the claims in view of Karasiuk and Coleman. The Examiner's finding that the claims are patentable over Karasiuk and Coleman shows that the claims are likewise patentable over Karasiuk and Palmer.

Eunsung also cannot rely on Trueba to overcome Section 325(d). Trueba adds nothing of consequence to the grounds. Eunsung relies on Trueba as allegedly disclosing a computer control and display (Pet., 45-52, 80-83). However, the Examiner previously asserted that Duchon (Publ. No. 2003/0018252) allegedly disclosed these features, and ultimately allowed the claims. *See* Ex. 1002, 172-173. Therefore, Trueba cannot call into question the Examiner's patentability findings.

Accordingly, Eunsung's reliance on the same or substantially the same art that was previously presented to the Office, as demonstrated above, is sufficient to satisfy the first step of the *Advanced Bionics* framework.

2. *Advanced Bionics*, Part 2 – Eunsung cannot show the Patent Office erred in a manner material to the patentability of the claims

Because Eunsung's Petition satisfies the first step of *Advanced Bionics*, Eunsung is required to proceed to the second step and show that the Office erred in a manner material to the patentability of challenged claims. Eunsung "must explain,

“with reference to *Becton Dickinson* factors (c), (e), and (f), how the Examiner erred in overlooking the prior art.” *Ecto World*, Paper 13, at 6 (citing *Advanced Bionics*, Paper 6, at 10).

Eunsung’s burden is to show that no reasonable examiner could have agreed with Mr. Knauss’s evaluation of the pending claims during prosecution in view of the cited prior art. *Id.* (“[A] petitioner must demonstrate that, for example, the previously presented art teaches the limitations of the challenged claims, and that no reasonable examiner could have found otherwise.”); *see also Advanced Bionics*, Paper 6, at 9 (“If reasonable minds can disagree regarding the purported treatment of the art or arguments, it cannot be said that the Office erred in a manner material to patentability.”). Eunsung cannot show that the Patent Office made any such material error.

***Becton Dickinson* factor (c)** addresses “the extent to which the asserted art was evaluated during examination, including whether the prior art was the basis for rejection.” *Becton Dickinson*, Paper 8, at 17.

Examiner Knauss extensively evaluated Greenberg during prosecution of U.S. Patent No. 9,550,052 (“’052 Patent”)—a patent in the same family and assigned to HydraFacial—and relied on it in combination with Coleman to reject the pending independent claims and various dependent claims. *See* IPR2025-00445, Ex. 1002, 102, 106-110.

Examiner Knauss also extensively evaluated Karasiuk during prosecution of the '052 Patent. In an Office Action dated August 5, 2015, the Examiner expressly acknowledged that Karasiuk's parent—which has nearly the same disclosure as Karasiuk—is “considered pertinent to applicant's disclosure,” but ultimately declined to rely on it in rejecting the claims.

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Conclusion

11. The prior art made of record and not relied upon is considered pertinent to applicant's disclosure: Muldner (US 6,277,128 B1) (Figures 7 and 10), Rosso (US 6,432,114 B1) (Figures 1-3), Karasiuk (US 6,695,853 B2) (Figure 5), Chang (US 7,232,444 B2) (Figures 1-5), Goble et al. (US 2006/0116674 A1) (Figures 1-3).

IPR2025-00445, Ex. 1002, 163 (annotation added).¹ Moreover, Examiner Knauss specifically identified Karasiuk itself in four separate search queries, including

¹ U.S. Patent No. 6,695,853 to Karasiuk is the parent to the Karasiuk reference relied on in the Petition as Ex. 1004. *See* Ex. 1004 at 1. The child application (Ex. 1004) was filed as a continuation-in-part and includes additional disclosure, but the Fig. 6 embodiment relied on by Eunsung in this IPR is the substantively the same between these references. The Examiner's reference to “Figure 5” in the Office Action is likely a typographical error and should have been “Figure 6.”

Search 44, where it was queried among just a few other references. *Id.*, 57 (“20030212415,” referring to Publ. No. 2003/0212415); *id.*, 50, 53, 60.

With respect to ***Becton Dickinson* factor (e)**—“whether Petitioner has pointed out sufficiently how the Examiner erred in its evaluation of the asserted prior art” (*Becton Dickinson*, Paper 8, at 18)—Eunsung asserts that “[t]o the extent Karasiuk, Greenberg, and Waldron were previously considered, the Examiner erred in overlooking the teachings cited in this Petition” and that “[t]he Examiner also did not have the benefit of considering their teachings in combination with Palmer or Trueba.” Pet., 85. These conclusory assertions are pure speculation, supported by no evidence. Nothing in the prosecution history even suggests the Examiner overlooked, ignored, or misapplied the teachings of Karasiuk, Greenberg, or the other prior art of record.

Moreover, even if a reasonable mind could interpret the prosecution history as suggesting the Examiner may have overlooked any prior-art teachings, a reasonable mind could also interpret the prosecution history as showing that the Examiner considered Karasiuk and Greenberg, along with the other prior art of record, and determined that the claims would not have been obvious over any combination of that art. In that case, where “reasonable minds can disagree regarding the purported treatment of art or arguments, it cannot be said that the

Office erred in a manner material to patentability.” *Advanced Bionics*, IPR2019-01469, Paper 6, at 9.

Becton Dickinson factor (f) address “the extent to which additional evidence and facts presented in the Petition warrant reconsideration of the prior art or arguments.” *Becton Dickinson*, Paper 8, at 18. In the Petition, Eunsung merely argues the “Examiner also did not have the benefit of considering” Karasiuk and Greenberg “in combination with Palmer or Trueba.” Pet., 85. However, as explained above, the Palmer teaching Eunsung relies on—multiple containers for dental irrigation—is at best cumulative, and indeed, less relevant, than Coleman’s teaching of multiple containers for dermatological treatment. And the Trueba teachings Eunsung relies on—a computer control and display—are not only unrelated to the reasons the claims were allowed during examination, but also cumulative of the Duchon reference the Examiner applied against the claims.

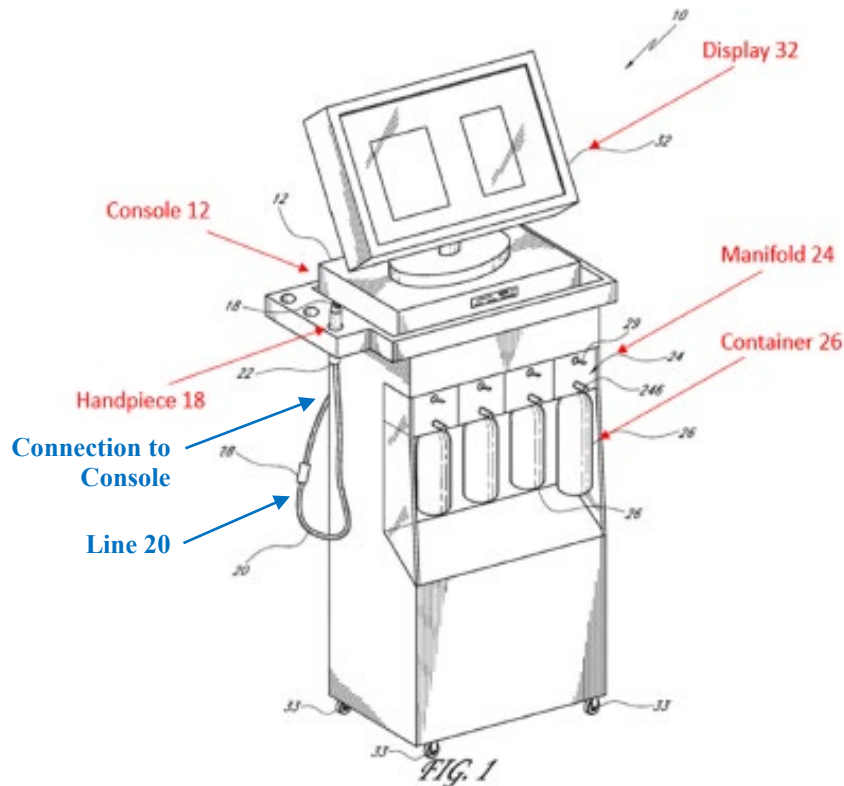
Accordingly, Eunsung has not shown—and cannot show—the Examiner materially erred in allowing the claims over Karasiuk and the other prior art of record. Therefore, the Board should defer to the Examiner’s patentability finding by denying the Petition. *Advanced Bionics*, IPR2019-01469, Paper 6, at 9.

B. The Director Should Deny the Petition Due to the Weak Merits Underlying Eunsung’s Unpatentability Challenge

The Director should decline to institute the IPR based on the weakness of Eunsung’s unpatentability challenge. The combination of Karasiuk and Palmer in Grounds 1A-1D and Greenberg in Grounds 2A-2D fail to disclose limitations required by all claims—namely, “a supply line connected/extending between the handpiece and the console for sequentially delivering treatment material to the handpiece from the first container or the second container” and “a waste line connected/extending between the handpiece and the console.”

1. The Karasiuk-Palmer Combination Does Not Disclose a Supply Line and a Waste Line Connected/Extending Between the Handpiece and the Console

Referring to Fig. 1, the ’607 patent explains that the “treatment system 10 includes a console 12 and a handpiece assembly 18 *connected to* the console 12 via a line 20.” Ex. 1001, 5:27-29 (emphasis added). Annotated Fig. 1 in the Petition shows this configuration:

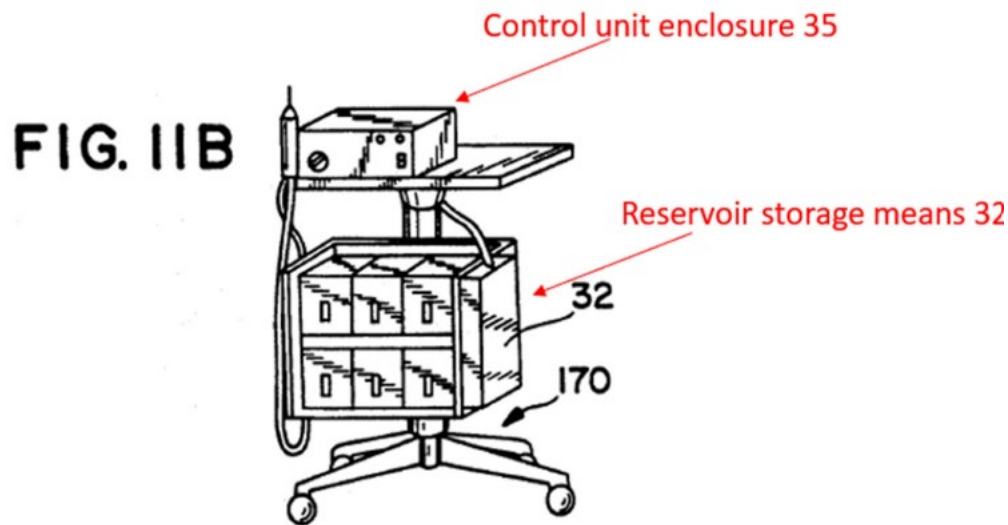


Pet., 4 (Ex. 1001, Fig. 1)². The '607 patent states that “[t]he line 20 can comprise one or more conduits *extending between* the console 12 and the handpiece assembly 18.” Ex. 1001, 5:66-6:1 (emphasis added). The '607 patent further states that “the line 20 includes a *supply line* and a *waste line* for delivering and returning material, respectively, as detailed below.” *Id.*, 6:1-3 (emphasis added).

Eunsung relies on Palmer’s mobile cart 170 for the console. Pet., 13 (“The Karasiuk-Palmer system includes a *console* in the form of, for example, ‘mobile cart

² Blue annotations to the figures were added by Patent Owner and the red annotations were added by Petitioner.

170”) (emphasis by Eunsung). The Petition includes this annotated image of Fig. 11B from Palmer showing the mobile cart 170:



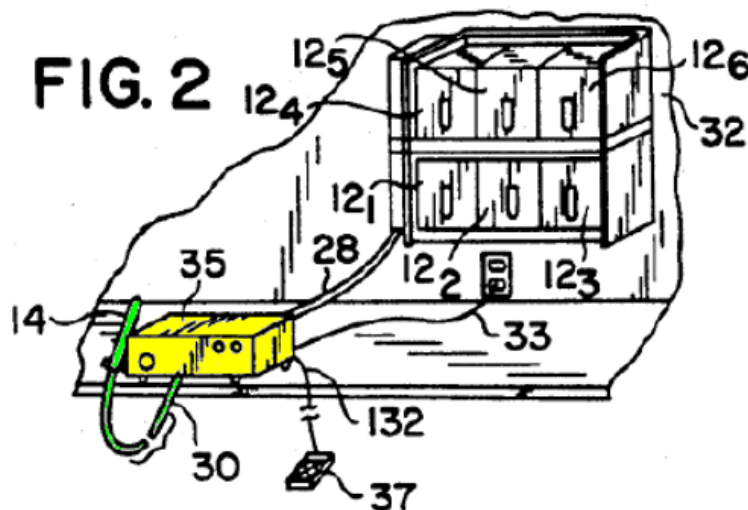
Palmer, FIG. 11B

Pet., 14.

However, Palmer’s handpiece is not connected to Palmer’s mobile cart 170. Instead, Palmer’s handpiece is connected by tubing to “control unit enclosure 35.” *See* Ex. 1005, 5:16-20. Eunsung concedes this point, asserting that “[i]n Karasiuk-Palmer, Karasiuk’s device 10 (*handpiece*) is connected to Palmer’s selector valve means 20, which is stored in control unit enclosure 35 on Palmer’s mobile cart 170 (*console*).” Pet., 16-17 (emphasis by Eunsung). That is, Eunsung contends that Karasiuk’s handpiece is *connected to* Palmer’s selector valve means 20 in control unit enclosure 35, and not connected to Palmer’s mobile cart 170, which Eunsung identifies as the console.

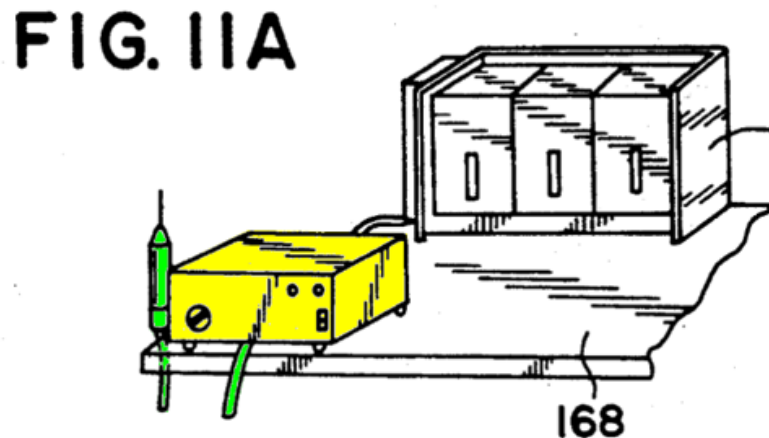
Palmer emphasizes the importance of having the control unit enclosure 35 and reservoir storage means 32 as modular components in Palmer's system. For example, Palmer explains that "the present invention" includes "modular means for storing solution reservoirs" and providing "substantial flexibility in setting up the system." Ex. 1005, 3:9-14. The system's modular configuration is an "advantage[]" in the installation of the system." *Id.*, 9:58-10:2. To that end, Palmer describes placing the control unit enclosure 35 and reservoir storage means 32 in different locations around the dental office, separate from each other. *Id.* In each instance, handpiece means 14 is connected only to control unit enclosure 35.

Fig. 2 shows control unit enclosure 35 on a countertop with handpiece 14 attached, and reservoir storage means 32 hanging on the wall.



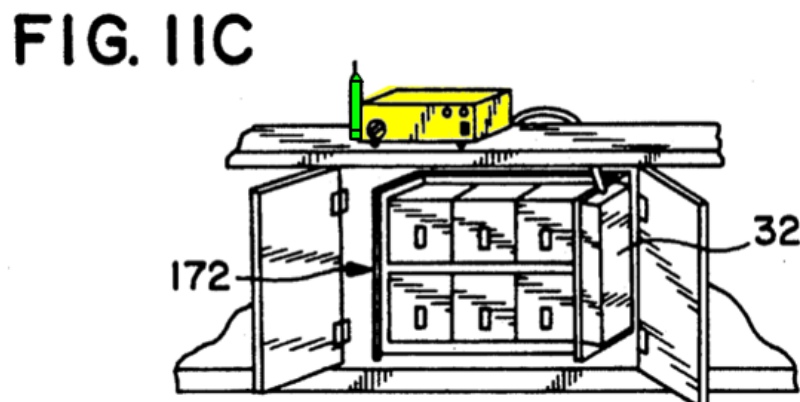
Ex. 1005, Fig. 2 (annotated), 5:10-13.

Fig. 11A shows control unit enclosure 35 and reservoir storage means 32 located a distance away on a countertop 168.



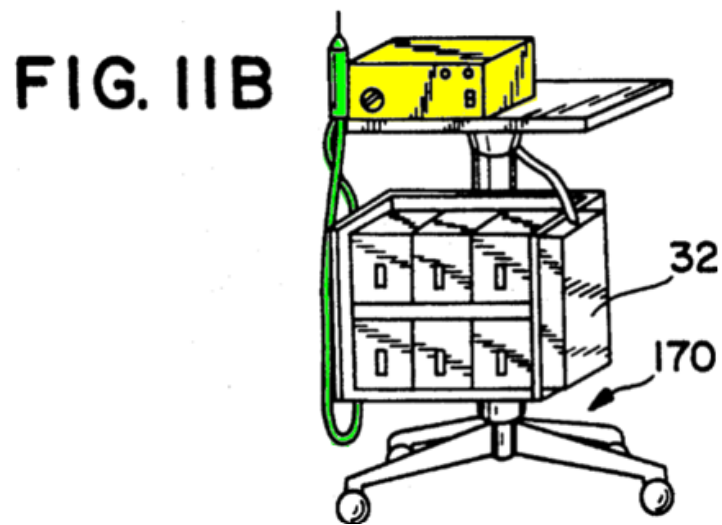
Id., Fig. 11A (annotated), 9:66-10:2.

Fig. 11C shows reservoir storage means 32 “in a cabinet 172 underneath a counter,” with control unit enclosure 35 on top of the counter.



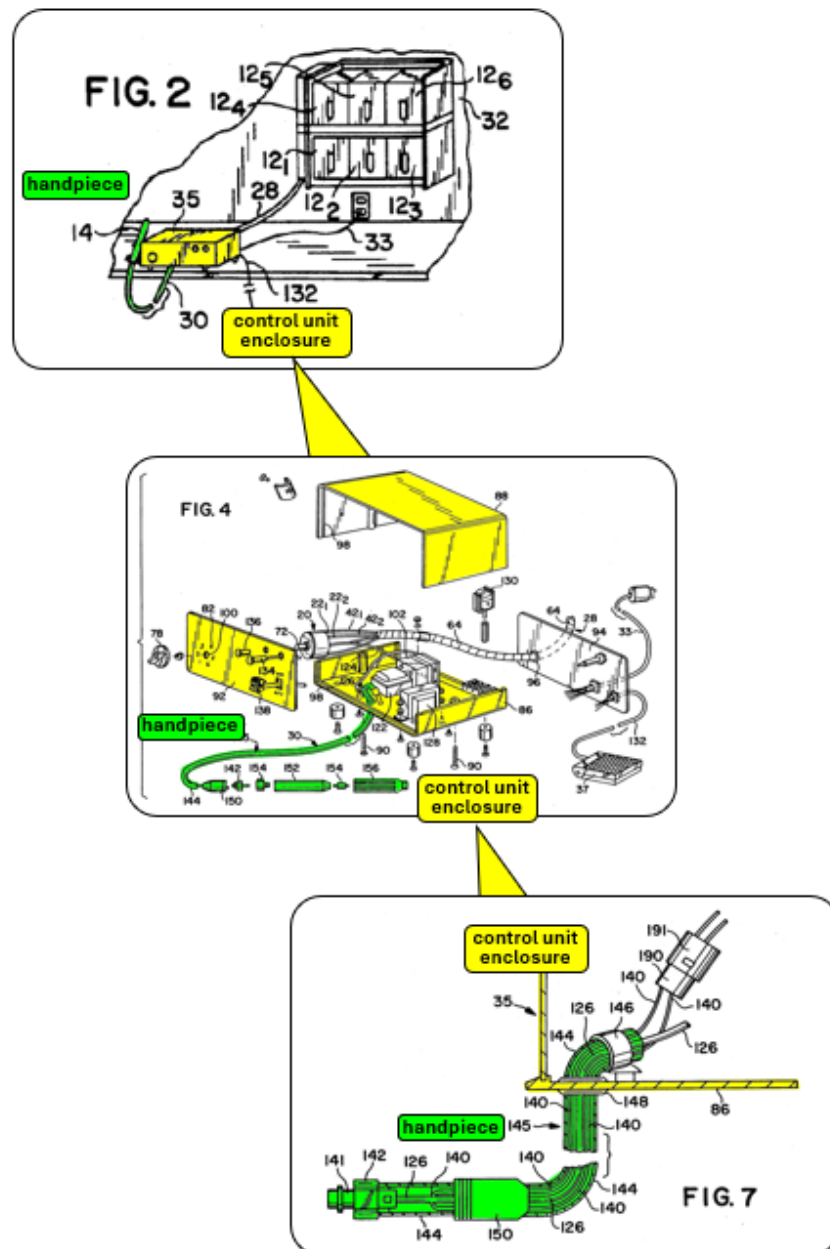
Id., Fig. 11C (annotated), 9:66-10:2.

Fig. 11B, which Eunsung relies on its Petition, shows Palmer’s control unit enclosure 35 on a shelf on the mobile cart 170 with the handpiece attached to control unit enclosure 35, not to the mobile cart 170.



Id., Fig. 11B (annotated), 9:66-10:2.

As shown in the annotated figures below (Palmer's Figs. 2, 4, and 7), Palmer's handpiece is connected to the modular control unit enclosure 35 and not connected to Palmer's mobile cart 170.



Ex. 1005, Figs. 2, 4, 7 (annotated); *see also id.*, 4:19-27.

With respect to Fig. 4, Palmer explains that “[s]econd tubing means 30 *couples the handpiece means 14 to the output of the pump within enclosure 35.*”

Id., 5:16-18 (emphasis added). And with respect to Fig. 7, Palmer explains that

“[t]he clear *handpiece tubing assembly*, designated 145, *is clamped within enclosure 35* by a cable clamp 146 and passes through the bottom member 86 through a grommet 148.” *Id.*, 9:37-40 (emphasis added).

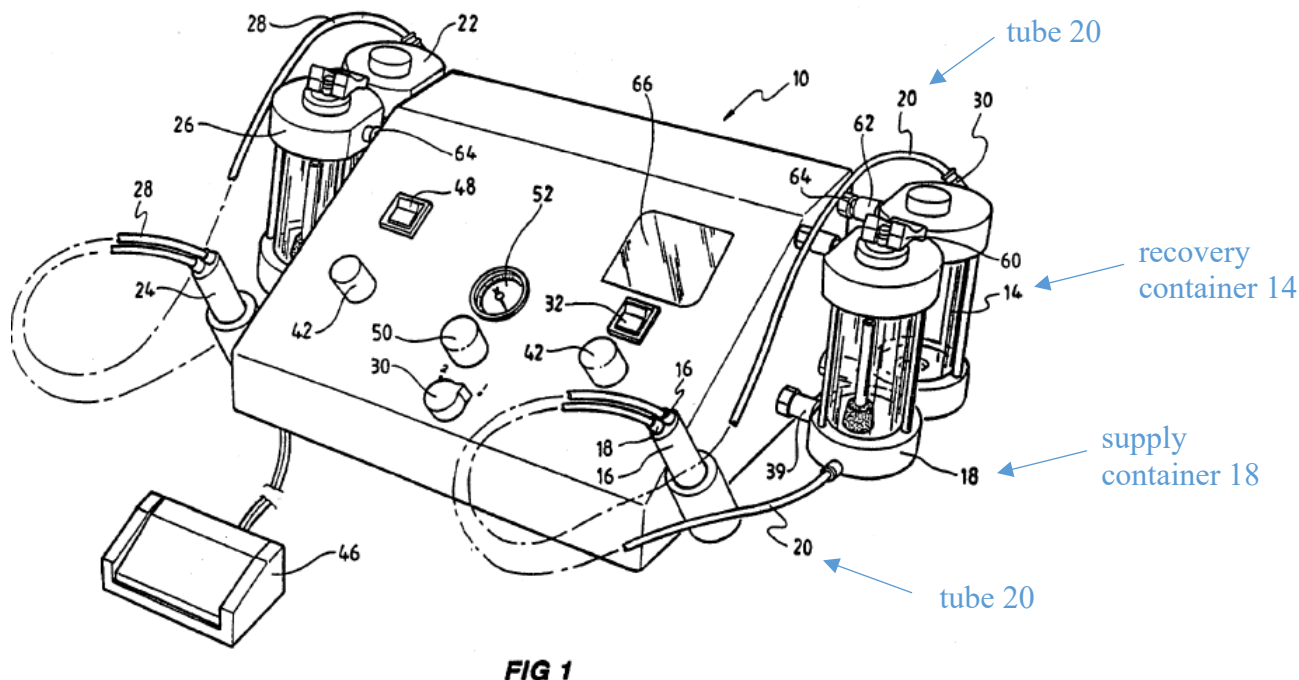
Eunsung contends “it would have been obvious to connect Karasiuk-Palmer’s supply line to an intermediate component, such as a port or receiver, on Palmer’s mobile cart 170 before ultimately connecting to other components located within or upon the console.” Pet., 18. However, Palmer’s handpiece is never connected to Palmer’s mobile cart that Eunsung alleges is the console. And Eunsung never explains why or how a POSITA would have connected Karasiuk’s handpiece to Palmer’s mobile cart in light of Palmer’s disclosure to the contrary. Eunsung points to Palmer’s Fig. 11B, but, as discussed above, that figure actually confirms Palmer’s handpiece is *not connected* to the mobile cart. Pet., 14.

Eunsung has not met its burden to show the Karasiuk-Palmer combination discloses a supply line connected (or extending) between the handpiece and the console for sequentially delivering treatment material or that it discloses a waste line connected (or extending) between the handpiece and the console. Therefore, the challenged claims would not have been obvious in view of Grounds 1A-1D.

2. Greenberg Does Not Disclose a Supply Line and a Waste Line Connected/Extending Between the Handpiece and the Console

In Grounds 2A-2D, Eunsung relies on Greenberg’s “apparatus 10” as the claimed console. Pet., 58 (“Greenberg describes the *console* by its ‘apparatus 10’”) (emphasis by Eunsung). Further, Eunsung contends that Fig. 1’s tube 20 serves as the supply line recited in the claims. Pet., 64 (“Although FIG. 5 does not label the path (dotted line) between valve 108 and handle 102, it would have been obvious that it is defined by a tube, such as tube 20 illustrated in FIG. 1, and this tube forms a ‘*supply line*’ within the meaning of element [1.3].”) (emphasis by Eunsung).

Greenberg’s Fig. 1 shows the embodiment’s use of tube 20 as part of system:



Ex. 1006, Fig. 1 (annotated). In a first instance in the Fig. 1 embodiment, tube 20 is connected between and extending between the handle 16 and the supply container

18. *See* 1006, Fig. 1, [0049]. And in a second instance, tube 20 is connected between and extending between the handle 16 and the recovery container 14. *See id.* The supply container 18 and recovery container 14 are located outside of the apparatus 10, which Eunsung contends is the claimed console. Thus, Eunsung has not established that this arrangement—where tube 20 is connected between and extending between the handle 16 and the supply container 18—satisfies the claim limitations.

In particular, the claim limitations recite that the supply line is connected or extending between the handpiece and the console “for sequentially delivering treatment material to the handpiece from the first container or the second container.” In Greenberg’s Fig. 1, the tube 20 is connected directly between only one supply container 18 and the handle 16 on the outside of the apparatus 10. Eunsung has not set forth any evidence or explanation of how Greenberg would permit sequentially delivering treatment material to the handpiece from multiple supply containers, as required by the claims.

Thus, Eunsung has not shown that Greenberg satisfies the claim limitations reciting “a supply line connected/extending between the handpiece and the console for sequentially delivering treatment material to the handpiece from the first container or the second container” or “a waste line connected/extending between the handpiece and the console.”

In sum, the Petition's unpatentability challenge rests on prior art that fails to disclose all claim limitations. Because the Petition does not present a reasonable likelihood of prevailing on unpatentability, the Director should decline to institute the IPR.

III. CONCLUSION

For the foregoing reasons, HydraFacial respectfully requests that the Director discretionarily deny institution of the Petition.

Respectfully submitted,

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CERTIFICATE OF TYPE-VOLUME LIMITATIONS
UNDER 37 C.F.R. § 42.24

The undersigned certifies that the foregoing **BRIEF IN SUPPORT OF PATENT OWNER’S REQUEST FOR DISCRETIONARY DENIAL** contains 3,980 words, exclusive of the parts exempted as provided in 37 C.F.R. § 42.24(a), and therefore complies with the type-volume limitations of 37 C.F.R. § 42.24(a).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **BRIEF IN SUPPORT OF PATENT OWNER’S REQUEST FOR DISCRETIONARY DENIAL** is being served on May 27, 2025, via email pursuant to 37 C.F.R. § 42.6(e), to counsel for Petitioner as addressed below:

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Dated: May 27, 2025

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