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Subject: IPR2025-00464, -465, -466 // certificate of correction motions
Date: Thursday, December 4, 2025 1:30:35 PM

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Dear Honorable Board,

I write on behalf of Patent Owner concerning IPR2025-00464 (U.S. Patent No. IPR2025-00464), IPR2025-00465 (U.S. Patent No. 11,241,414), and IPR2025-00466 (U.S. Patent No. 11,793,786) concerning authorization for three motions: (a) certificate of correction; (b) sealing certain documents; and (c) entry of the Default Protective Order.

First, Patent Owner seeks to obtain a certificate of correction from the Director to add a reference to the names of parties to a written joint research agreement (“JRA”) to the specification of U.S. Patent Nos. 8,895,546, 11,241,414, and 11,793,786, which are the patents at issue in the above-captioned IPR proceedings. See MPEP §§ 717.02(a)(II) (“if the patent as issued does not include the names of the parties to the joint research agreement, the patent must be corrected to include the names of the parties to the joint research agreement by a certificate of correction.”). As required by 37 C.F.R. § 1.323, Patent Owner respectfully requests the Board’s leave to file a motion for leave of 10 pages in length to request a certificate of correction. See *generally Honeywell Int’l Inc. v. Arkema Inc.*, 939 F.3d 1345 (Fed. Cir. 2019) (describing the process).

Second, Patent Owner requests leave to file a motion to seal confidential documents that it plans to cite in support of its motion for leave to correct the specification. These documents evidence the existence of the JRA and the relationships of the parties to the JRA, including: (i) Exhibit 2030 is a master services agreement; and (ii) Exhibit 2031 is an asset purchase agreement.

Third, Patent Owner requests leave to file a motion for entry of the Default Protective Order in the above-captioned proceedings. See Consolidated Trial Practice Guide (Nov. 2019), Appx. B; 37 C.F.R. § 42.54.

Petitioner states it opposes the Patent Owner’s requests seeking authorization to file a petition to the Director and motion to file the above-mentioned exhibits under seal since

Petitioner does not agree based on its current understanding of Petitioner's requests have an appropriate legal basis. To the extent either motion is granted, Petitioner requests authorization to file a reply up to the same number of pages as the respective motion is authorized for. Petitioner does not oppose Patent Owner's request to enter the Default Protective Order but reserves its right to seek modification of the Default Protective Order after reviewing Patent Owner's above-mentioned exhibits.

If the Board requests a conference call, Patent Owner and Petitioner can be available at the following times: any time Friday 12/5 or Tuesday 12/9 .

Sincerely,
David Tobin
Counsel for Patent Owner

David Tobin
Partner

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