

From: [Director_PTABDecision_Review](#)
To: ["Mace, Andrew"](#); [Eric Zelepugas](#); [Keefe, Heidi](#); [Weinstein, Mark](#); [Chen, Reuben](#); [Timothy Cremen](#); [James Gatto](#); [mrpatrick@sheppard.com](#); [Robert Conley](#); [USPTO](#)
Subject: RE: IPR2025-00472 (Google v. BrodTi) - Request for One-Week Extension of Time to File Director Review Request
Date: Wednesday, July 29, 2026 12:59:00 PM

Counsel,

Patent Owner's request for a one-week extension of filing Director Review Request is granted. See *Innoscence (Zhuhai) Tech. Co. v. Efficient Power Conversion Corp.*, IPR2023-01381, Paper 52 (Director Apr. 30, 2025) (finding that the patent owner had shown good cause for granting an extension where the patent owner recently retained new counsel and requested an extension of time before the deadline to file a Director Review request had elapsed). Patent Owner shall file its request for Director Review no later than August 6, 2026.

Thank you.

IPR2025-00472
Ex. 3103

From: Mace, Andrew <amace@cooley.com>
Sent: Wednesday, July 29, 2026 11:55 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Eric Zelepugas <zelepugas@avantechlaw.com>; Keefe, Heidi <hkeefe@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Chen, Reuben <rchen@cooley.com>; Timothy Cremen <tcremen@sheppard.com>; James Gatto <jgatto@sheppard.com>; mrpatrick@sheppard.com; Robert Conley <conley@avantechlaw.com>; USPTO <USPTO@avantechlaw.com>
Subject: RE: IPR2025-00472 (Google v. BrodTi) - Request for One-Week Extension of Time to File Director Review Request

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Dear Director,

While we normally do not oppose such requests, here, Patent Owner has changed counsel multiple times during the course of this matter and only again sought a replacement on the eve of their due date. Since the timing of Patent Owner's selection was entirely within Patent Owner's control, this cannot be good cause. As such we must oppose.

Respectfully,

Andrew Mace on behalf of Heidi Keefe
Counsel for Petitioner

Andrew Mace

Cooley LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
+1 650 843 5808 office
+1 650 849 7400 fax
amace@cooley.com

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Wednesday, July 29, 2026 6:41 AM
To: Eric Zelepugas <zelepugas@avantechlaw.com>; Keefe, Heidi <hkeefe@cooley.com>; Mace, Andrew <amace@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Chen, Reuben <rchen@cooley.com>; Timothy Cremen <tcremen@sheppard.com>; James Gatto <jgatto@sheppard.com>; mrpatrick@sheppard.com; Robert Conley <conley@avantechlaw.com>; USPTO <USPTO@avantechlaw.com>
Subject: RE: IPR2025-00472 (Google v. BrodTi) - Request for One-Week Extension of Time to File Director Review Request

Counsel,

Does Petitioner oppose to Patent Owner's request for an extension of time?

Thanks

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Wednesday, July 29, 2026 12:37 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Keefe, Heidi <hkeefe@cooley.com>; Mace, Andrew <amace@cooley.com>; mweinstein@cooley.com; rchen@cooley.com; Timothy Cremen <tcremen@sheppard.com>; James Gatto <jgatto@sheppard.com>; mrpatrick@sheppard.com; Robert Conley <conley@avantechlaw.com>; USPTO <USPTO@avantechlaw.com>
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Director,

Pursuant to 37 C.F.R. § 42.75(c)(1), Patent Owner respectfully requests a one-week extension of the deadline to file a Request for Director Review. Following the Final Written Decision on June 30, 2026, Patent Owner retained new counsel to evaluate the merits of a request for seeking Director Review. Earlier today, Patent Owner executed and filed a Power of Attorney appointing Avantech Law LLP as substitute counsel, and also filed updated Mandatory Notices identifying new lead counsel.

Patent Owner submits that good cause exists for an abbreviated extension. The deadline to

seek Director Review expires this Thursday, July 30. Substitute counsel has reviewed the record but has had limited opportunity to prepare its brief in support of PO's request for Director Review. Patent Owner therefore respectfully requests a one-week extension.

Best regards,

Eric A. Zelepugas



312-487-2185

zelepugas@avantechlaw.com

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