

From: [Director Discretionary Decision](#)
To: mmatulewicz-crowley@reichmanjorgensen.com; HBatts@sheppardmullin.com; LegalTM-AMD-Concurrent@sheppardmullin.com; clehman@reichmanjorgensen.com; amann@reichmanjorgensen.com; icarwile@reichmanjorgensen.com; RJ_XtreamEdge-AMD@reichmanjorgensen.com; CPonder@sheppardmullin.com; JLiang@sheppardmullin.com
Cc: [Director Discretionary Decision](#)
Subject: RE: IPR2025-00479 - New Developments Relevant to Discretionary Denial Briefing
Date: Monday, June 30, 2025 9:34:00 AM

Petitioner is authorized to enter the two orders as exhibits. No additional briefing is authorized at this time.

From: Harper Batts <HBatts@sheppardmullin.com>
Sent: Wednesday, June 25, 2025 10:33 AM
To: Michael Matulewicz-Crowley <mmatulewicz-crowley@reichmanjorgensen.com>; Trials <Trials@USPTO.GOV>
Cc: LegalTM-AMD-Concurrent <LegalTM-AMD-Concurrent@sheppardmullin.com>; Christine E. Lehman <clehman@reichmanjorgensen.com>; Ariane Mann <amann@reichmanjorgensen.com>; Laura Carwile <icarwile@reichmanjorgensen.com>; RJ_XtreamEdge-AMD <RJ_XtreamEdge-AMD@reichmanjorgensen.com>; Chris Ponder <CPonder@sheppardmullin.com>; Jeffrey Liang <JLiang@sheppardmullin.com>
Subject: RE: IPR2025-00479 - New Developments Relevant to Discretionary Denial Briefing

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Counsel,

Are you contending that somehow there wouldn't be good cause for briefing here? The two orders provided by e-mail (as has been the typical practice at the PTAB for over 10 years) issued after the parties' briefing and are on the exact issues briefed by the parties. It is axiomatic that good cause exists here for additional briefing.

Petitioners reiterate their position that the orders are clear as to why discretionary denial is not appropriate here but remain available to brief the issue should it be helpful to the Board.

Regards,

Harper
Harper Batts
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From: Michael Matulewicz-Crowley <mmatulewicz-crowley@reichmanjorgensen.com>
Sent: Tuesday, June 24, 2025 7:10 PM
To: Trials@uspto.gov
Cc: LegalTM-AMD-Concurrent <LegalTM-AMD-Concurrent@sheppardmullin.com>; Christine E.

IPR2025-00479
Ex. 3101

Lehman <clehman@reichmanjorgensen.com>; Ariane Mann <amann@reichmanjorgensen.com>;
Laura Carwile <lcawile@reichmanjorgensen.com>; RJ_XtreamEdge-AMD <RJ_XtreamEdge-AMD@reichmanjorgensen.com>; Chris Ponder <CPonder@sheppardmullin.com>; Jeffrey Liang
<JLiang@sheppardmullin.com>; Harper Batts <HBatts@sheppardmullin.com>

Subject: RE: IPR2025-00479 - New Developments Relevant to Discretionary Denial Briefing

Dear Honorable Board,

Petitioners' email and attached documents (which were sent without notice to Patent Owners) are improper and should be disregarded. Petitioners have already filed their opposition brief in response to Patent Owner's Discretionary Denial briefing. Paper 7. Acting Director Stewart's Interim Processes for PTAB Workload Management states that "[l]eave to file further briefing *may be permitted for good cause*." March 26, 2025 Interim Processes for PTAB Workload Management at 2 (emphasis added). Petitioners have not requested leave nor even attempted to show good cause. Petitioners cannot simply submit evidence and argument via email, outside of the procedures and protections of the Board's processes. Patent Owner's request that Petitioners' email and attached documents be disregarded.

Best,
Michael Matulewicz-Crowley
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400 Madison Avenue, Suite 14D
New York, NY 10017
(332) 208-7170

From: Harper Batts <HBatts@sheppardmullin.com>

Sent: Tuesday, June 24, 2025 9:22 PM

To: Trials@uspto.gov

Cc: LegalTM-AMD-Concurrent <LegalTM-AMD-Concurrent@sheppardmullin.com>; Michael Matulewicz-Crowley <mmatulewicz-crowley@reichmanjorgensen.com>; Christine E. Lehman <clehman@reichmanjorgensen.com>; Ariane Mann <amann@reichmanjorgensen.com>; Laura Carwile <lcawile@reichmanjorgensen.com>; RJ_XtreamEdge-AMD <RJ_XtreamEdge-AMD@reichmanjorgensen.com>; Chris Ponder <CPonder@sheppardmullin.com>; Jeffrey Liang <JLiang@sheppardmullin.com>

Subject: IPR2025-00479 - New Developments Relevant to Discretionary Denial Briefing

CAUTION: EXTERNAL SENDER

Dear Honorable Board,

Petitioners contact the Board to respectfully provide notification of new developments. Specifically, the district court in *Concurrent Ventures, LLC et al. v. Advanced Micro Devices, Inc., et al.*, No. 24-CV-00335-ADA (W.D. Tex.) issued orders today canceling the *Markman* hearing (with no rescheduled date) and staying the case pending venue discovery. The relevant orders are attached.

This procedural development directly impacts the discretionary denial briefing and accompanying

analysis that is currently before the Board in IPR2025-00479.

Per the district court's order, the case is stayed until the court's resolution of the transfer motion, which will occur after completion of venue discovery (by September 3, 2025) and additional transfer briefing (by October 1, 2025).

Moreover, as Petitioners explained in their discretionary denial briefing, if the district court does transfer the case in October or thereafter, such a transfer would significantly impact at least *Fintiv* factors 1 to 3, because: (1) the N.D. Cal. typically stays cases pending IPR petitions; (2) the trial date is very likely to be further delayed after transfer; and (3) the case is likely to remain at an early stage at the time of the IPR institution decisions.

Petitioners are ready to submit briefing on these developments upon request.

Respectfully Submitted,

Harper Batts

Lead Counsel for Petitioners

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