

From: [Director Discretionary Decision](#)
To: ["Wolfe, Joseph"](#)
Cc: ["Nall, Jennifer"](#); ["Papastavros, Nick"](#); ["Heintz, James M."](#); ["Burns IV, Michael"](#); ["Hopkins, Matt"](#); ["Ferguson, Brian E."](#); ["Mann, Rex"](#); ["patent.matters@pronetcorp.com"](#); ["Winston-H2"](#); [Trials](#)
Subject: FW: IPR2025-00480 - Request for authorization to file additional stipulation
Date: Wednesday, June 11, 2025 11:58:00 AM
Attachments: [image001.png](#)

Counsel,

You may file your stipulation as an exhibit.

From: Wolfe, Joseph <Joseph.Wolfe@us.dlapiper.com>
Sent: Tuesday, June 10, 2025 5:43 PM
To: Trials <Trials@USPTO.GOV>
Cc: Nall, Jennifer <Jennifer.Nall@us.dlapiper.com>; Papastavros, Nick <Nick.Papastavros@us.dlapiper.com>; Heintz, James M. <Jim.Heintz@us.dlapiper.com>; Burns IV, Michael <Michael.Burns@us.dlapiper.com>; Hopkins, Matt <MHopkins@winston.com>; Ferguson, Brian E. <BEFerguson@winston.com>; Mann, Rex <RMann@winston.com>; patent.matters@pronetcorp.com; Winston-H2 <Winston-H2@winston.com>
Subject: RE: IPR2025-00480 - Request for authorization to file additional stipulation

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Dear Honorable Board,

The substance of the stipulation is that, if the IPR is instituted, Petitioner will not assert in the related district court proceeding any §103 defense based on a combination of any system prior art with any prior art raised in the Petition.

Please let us know if you have any further questions.

Regards,
Joe

Joseph Wolfe
215.656.3359

From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, June 10, 2025 4:21 PM
To: Wolfe, Joseph <Joseph.Wolfe@us.dlapiper.com>; Trials <Trials@USPTO.GOV>
Cc: Nall, Jennifer <Jennifer.Nall@us.dlapiper.com>; Papastavros, Nick <Nick.Papastavros@us.dlapiper.com>; Heintz, James M. <Jim.Heintz@us.dlapiper.com>; Burns IV,

Michael <Michael.Burns@us.dlapiper.com>; Hopkins, Matt <MHopkins@winston.com>; Ferguson, Brian E. <BEFerguson@winston.com>; Mann, Rex <RMann@winston.com>; patent.matters@pronetcorp.com; Winston-H2 <Winston-H2@winston.com>
Subject: RE: IPR2025-00480 - Request for authorization to file additional stipulation

 EXTERNAL MESSAGE

Counsel,

What is the nature of the stipulation that you are requesting to file?

Regards,

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

From: Wolfe, Joseph <Joseph.Wolfe@us.dlapiper.com>
Sent: Tuesday, June 10, 2025 3:13 PM
To: Trials <Trials@USPTO.GOV>
Cc: Nall, Jennifer <Jennifer.Nall@us.dlapiper.com>; Papastavros, Nick <Nick.Papastavros@us.dlapiper.com>; Heintz, James M. <Jim.Heintz@us.dlapiper.com>; Burns IV, Michael <Michael.Burns@us.dlapiper.com>; Hopkins, Matt <MHopkins@winston.com>; Ferguson, Brian E. <BEFerguson@winston.com>; Mann, Rex <RMann@winston.com>; patent.matters@pronetcorp.com; Winston-H2 <Winston-H2@winston.com>
Subject: IPR2025-00480 - Request for authorization to file additional stipulation

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Dear Honorable Board,

Petitioners request permission to file an additional stipulation with the Board as a separate exhibit.

Patent Owner does not oppose this request.

Petitioners and Patent Owner can make themselves available for a call at the Board's convenience.

Regards,
Joe

Joseph Wolfe

Of Counsel

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DLA Piper LLP (US)

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