

From: [Trials](#)
To: [Nall, Jennifer](#); [Trials](#)
Cc: [DLA-HD-H2](#); [Ferguson, Brian E.](#); IPR-h2@winston.com; [Border, Scott](#)
Subject: RE: IPR2025-00480 - Petitioner Request to Reply to POPR
Date: Wednesday, September 10, 2025 12:53:14 PM
Attachments: [image001.png](#)
[image002.png](#)

Counsel,

On September 9, 2025, Petitioner contacted the Board seeking leave to file a three-page Reply to the Patent Owner's Preliminary Response to address the proper construction of "limitation 1b." Patent Owner opposes the request. Petitioner's request is granted. Petitioner may file a Reply of up to three pages addressing the issue identified by no later than September 15, 2025. Patent Owner may file a Sur-Reply of up to three pages addressing the content of Petitioner's Reply by no later than September 18, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
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From: Nall, Jennifer <Jennifer.Nall@us.dlapiper.com>
Sent: Tuesday, September 9, 2025 4:48 PM
To: Trials <Trials@USPTO.GOV>
Cc: DLA-HD-H2 <DLA-HD-H2@us.dlapiper.com>; Ferguson, Brian E. <BEFerguson@winston.com>; IPR-h2@winston.com; Border, Scott <SBorder@winston.com>
Subject: IPR2025-00480 - Petitioner Request to Reply to POPR

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Dear Honorable Board,

Petitioner seeks leave from the Board to file a 3-page reply to Patent Owner's Preliminary Response to address how Patent Owner's POPR incorrectly construes limitation 1b to require the "creation" of perimeters rather than the use of pre-existing perimeters, which

reads out disclosed embodiments of a perimeter being a city boundary, road, or physical address.

Patent Owner opposes Petitioner's request for a reply brief. The plain language of limitation 1[b] is "establishing" a plurality of perimeters, which does not exclude using pre-existing boundaries but does require that the method "establish[]" those boundaries as part of the claimed method. Petitioner is mischaracterizing the POPR to file a reply brief not to address claim construction but instead to attempt to close the numerous gaps in the Petition, and Patent Owner respectfully asserts that the Board does not need further briefing to consider the parties' arguments. If, however, the Board allows Petitioner to file a reply brief, Patent Owner requests that it be provided the opportunity to file an equal-length sur-reply brief.

Counsel for the parties are available for a conference call should the Board so desire on the following days: Sept. 10-12.

Respectfully,
Jennifer

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