

From: [Director Discretionary Decision](#)
To: [Birbach, Naomi](#); [Director Discretionary Decision](#)
Cc: [MDT-Samsung-BR](#); [DG-Samsung-MDT](#); [Gordon, Lori A](#); [Ong, Andrew](#); [Robinson, Erick](#); [Dunn, Patrick](#); [Rafatijo, Homayoon](#); [Partridge, Jayme](#)
Subject: RE: IPR2025-00535: Request for Additional Briefing
Date: Friday, June 20, 2025 9:24:34 AM
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[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Patent Owner is authorized to file a supplemental reply brief, limited to two pages, addressing Petitioner's amended *Sotera* Stipulation – due Monday June 23, 2025.

Petitioner is authorized to file a sur-reply brief, limited to six pages, due June 25, 2025.
Petitioner is no longer authorized to file a sur-reply on Friday June 20, 2025 (per the June 13, 2025 email). Instead, Petitioner shall consolidate all arguments into the brief due on June 25, 2025. No additional briefing will be authorized in this case.

From: Birbach, Naomi <NBirbach@goodwinlaw.com>
Sent: Wednesday, June 18, 2025 3:48 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: MDT-Samsung-BR <MDT-Samsung-BR@brownrudnick.com>; DG-Samsung-MDT <DG-Samsung-MDT@goodwinlaw.com>; Gordon, Lori A <LoriGordon@goodwinlaw.com>; Ong, Andrew <AOng@goodwinlaw.com>; Robinson, Erick <ERobinson@brownrudnick.com>; Dunn, Patrick <PDunn@brownrudnick.com>; Rafatijo, Homayoon <HRafatijo@brownrudnick.com>; Partridge, Jayme <JPartridge@brownrudnick.com>
Subject: IPR2025-00535: Request for Additional Briefing

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Dear Honorable Director,

The parties jointly write regarding the discretionary denial briefing in IPR2025-00535. On June 17, Petitioners notified Patent Owner that they have amended their *Sotera* stipulation to provide a “*Sotera Plus*” stipulation that is more restrictive on Petitioners. Petitioners updated “*Sotera Plus*” stipulation was provided to Patent Owner on June 17 and will be provided to the Board in Petitioners’ sur-reply brief due this Friday.

Patent Owner objects to this late service. Petitioner submits that its updated stipulation was timely in view of the Board’s recent Discretionary Denial decisions. The parties met and conferred, and

while PO continues its objection, has agreed with Petitioner, subject to Your Honor's approval, to the following additional briefing schedule given Petitioners' amended "*Sotera Plus*" stipulation:

- June 20, 2025: Patent Owner may file an additional brief of no more than 4 pages regarding Petitioners' amended *Sotera* stipulation
- June 24, 2025: Petitions may file an additional brief of no more than 4 pages to respond to arguments raised by Patent Owner in their June 20, 2025 brief.

The parties accordingly respectfully request that the Board authorize the above additional briefing. We look forward to hearing from the Board on whether the parties' request is approved.

Regards,
Naomi Birbach

Naomi Birbach



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