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Subject: RØDE Microphones, LLC, et al. v. Zaxcom, Inc., IPR2025-00557
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To the Board:

Petitioners RØDE Microphones , LLC and Freedman Electronics Pty Ltd. (“Petitioners” or “RØDE”) request authorization to move for leave to file a 6-page Reply to the Patent Owner’s Preliminary Response (“POPR”) in the above-referenced case, in order to address the following issues raised in the POPRs:

1. Construction of “locally generated audio,” and/or the presence of such features in the prior art in view of Zaxcom's proposed construction;
2. Construction of “local audio device wearable by a creator of said locally generated audio,” and/or the presence of such features in the prior art in view of Zaxcom's proposed construction;
3. Construction of “master timecode” and “master timecode generator,” and/or the presence of such features in the prior art in view of Zaxcom's proposed construction; and
4. Construction of “multi-track recorder,” and/or the presence of such features in the prior art in view of Zaxcom's proposed construction.

RØDE proposes August 7, 2025 as the deadline for the Reply.

Patent Owner Zaxcom, Inc. opposes RØDE’s request. The parties have met and conferred on the matter but have been unable to reach agreement.

The parties are available for a teleconference with the Board to discuss RØDE’s request at the following times:

- Friday, July 18: 11:00 am – noon ET
- Monday July 21: 9:00-11:30 am or 3:00-4:00 pm ET

Regards,

Michael A. Fisher

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