

From: [Director Discretionary Decision](#)
To: [Colette Woo](#); [Director Discretionary Decision](#)
Cc: [Nathan Lowenstein](#); [Kenneth Weatherwax](#); [NeuralAI](#); [Buroker, Brian M.](#); [Kieckhefer, L. Kieran](#); [Curtis, Nathan R.](#); [Lu, Vivian](#); [*** GDC-NVIDIA-IPR](#)
Subject: RE: IPR2025-00606, -0068 - Request for Authorization to File Replies and Evidence
Date: Wednesday, July 30, 2025 3:07:28 PM

Patent Owner's request for additional briefing is denied as there is not sufficient time to permit additional briefing.

From: Colette Woo <woo@lowensteinweatherwax.com>
Sent: Wednesday, July 30, 2025 12:20 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; NeuralAI <NeuralAI-IPRs@lowensteinweatherwax.com>; Buroker, Brian M. <BBuroker@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; Lu, Vivian <VLu@gibsondunn.com>; *** GDC-NVIDIA-IPR <GDC-NVIDIA-IPR@gibsondunn.com>
Subject: IPR2025-00606, -0068 - Request for Authorization to File Replies and Evidence

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Dear Honorable Director,

Patent Owner Neural AI, LLC respectfully requests authorization to submit 3-page Replies and evidence in the above-referenced cases relevant to the Director's decision in *Intel Corp. v. Proxense LLC*, IPR2025-00327, Paper 12 (June 26, 2025).

More specifically, Patent Owner wishes to present evidence that the patents challenged have been licensed in Petitioner's technology space. The proposed briefing will generally correspond to pages 49-52 of Patent Owner's Discretionary Denial Brief in IPR2025-00609. See *also* IPR2025-00610, Discretionary Denial Brief, pp. 48-51. Patent Owner proposes filing exhibits 2040-2043, and 2046-2048 from those cases in the above-mentioned matters. To the extent good cause must be shown, it exists because *Proxense* issued after Patent Owner filed its Discretionary Denial Briefs, and thus, Patent Owner did not know evidence of a license was relevant to a demonstration of settled expectations when it filed its briefs.

Counsel for Patent Owner has met and conferred with counsel for Petitioner, and Petitioner opposes the request. Petitioner believes that this request is untimely. Patent Owner waited over two weeks after the Petition's Oppositions were filed on July 14 and

15 and over a month after the *Proxense* decision was issued on June 26 to request briefing on that case. Moreover, the request does not show good cause because the Director's March Process Memorandum made clear that settled expectations and other factors would be considered so Patent Owner should have raised the alleged licensing if it believed it was relevant to that issue. To the extent the Director permits a reply, Petitioner requests a sur-reply of equal length.

If the Director deems a call necessary, the parties are available for a call on Thursday from 1 p.m. - 1:30 p.m. or 3-4 p.m. Eastern, Friday from 1-3 p.m. or 4-5 p.m. Eastern, or Monday 1- 4 p.m. Eastern.

Respectfully submitted,

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