

From: [Director_PTABDecision_Review](#)
To: "Josh Griswold"; [Director_PTABDecision_Review](#); akapadia@mwe.com; [Kenneth Darby](#); [Michael Hawkins](#); [Baile Xie](#); [IPR56224-0006IP1](#); [IPR56224-0013IP1](#); [Oaks, Brian](#); kmeek@mwe.com; sfareed@mwe.com; [IPR-Stratasys-MWE](#)
Subject: RE: IPR2025-00257 and IPR2025-00611: Director Review Requests
Date: Tuesday, November 18, 2025 7:55:00 AM

Counsel,

Patent Owner's request to submit briefing in the above identified proceedings is denied. The parties are reminded that they must timely apprise the Board of developments regarding adjudication of validity or patentability of the challenged patent claims, or substantially similar patent claims, such as claim construction, findings of fact, or conclusions of law, in any matter that must be identified as a related matter under 37 C.F.R. § 42.8(b)(2). See IPR2025-00257, Paper 19, at 1; IPR2025-00611, Paper 12, at 2–3.

Thanks.

IPR2025-00257 and IPR2025-00611
Ex. 3102

From: Josh Griswold <griswold@fr.com>
Sent: Wednesday, November 12, 2025 1:21 PM
To: [Director_PTABDecision_Review](#) <Director_PTABDecision_Review@uspto.gov>; akapadia@mwe.com; [Kenneth Darby](mailto:kdarby@fr.com) <kdarby@fr.com>; [Michael Hawkins](mailto:michael.hawkins@fr.com) <michael.hawkins@fr.com>; [Baile Xie](mailto:baile.xie@fr.com) <baile.xie@fr.com>; [IPR56224-0006IP1](mailto:IPR56224-0006IP1@fr.com) <IPR56224-0006IP1@fr.com>; [IPR56224-0013IP1](mailto:IPR56224-0013IP1@fr.com) <IPR56224-0013IP1@fr.com>; [Oaks, Brian](mailto:Boaks@mwe.com) <Boaks@mwe.com>; kmeek@mwe.com; sfareed@mwe.com; [IPR-Stratasys-MWE](mailto:IPR-Stratasys-MWE@mwe.com) <IPR-Stratasys-MWE@mwe.com>
Subject: RE: IPR2025-00257 and IPR2025-00611: Director Review Requests

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Your Honor,

Petitioner opposes Patent Owner's belated, additional Director Review requests. Not only are these additional requests made after the deadline, they are also contrary to 37 CFR § 42.75(c), which expressly limits a party to file only "one" Director Review request for a given decision.

Moreover, the precedent Patent Owner cites to justify its request is not new. For example, former Acting Director Stewart discretionary denied an IPR almost two months ago (September 19, 2025) based on conflicting claim constructions. *Sun Pharmaceuticals Industries, Inc. v. Nivagen Pharmaceuticals, Inc.*, IPR2025-00893, Paper 18 (citing *Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, IPR2024-00952, Paper 12 at 8–9 (PTAB Dec. 13, 2024) (informative)). Patent Owner has known of Petitioner's district court positions since August 20, 2025, when the parties exchanged proposed constructions. Patent Owner's complaint could

and should have been raised before the respective Director Review deadlines.

Finally, unlike the *Revvo* and *Tesla* cases, the IPR2025-00257 and IPR2025-00611 proceedings have been instituted and the Board will have the benefit of the district court's Markman order in likely just a few weeks. And, the indefiniteness raised in the district court relates to the "outer boundaries" of the claim terms, driven by Patent Owner's overly broad infringement assertions. It is not relevant to the asserted prior art that aligns with the "preferred embodiment" in each challenged patents. See., e.g., IPR2025-00611, Petition, p. 2 ("Given the noticeable overlap between the preferred embodiment of the '774 Patent and the prior art/predictable combinations....").

Counsel for Petitioner can be available for a telephonic hearing, if needed, any time November 14, 17 or 18th.

Best regards,
Joshua Griswold
Counsel for Petitioner

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Wednesday, November 12, 2025 10:31 AM
To: akapadia@mwe.com; Josh Griswold <griswold@fr.com>; Kenneth Darby <kdarby@fr.com>; Michael Hawkins <hawkins@fr.com>; Baile Xie <xie@fr.com>; IPR56224-0006IP1 <IPR56224-0006IP1@fr.com>; IPR56224-0013IP1 <IPR56224-0013IP1@fr.com>; Oaks, Brian <Boaks@mwe.com>; kmeek@mwe.com; sfareed@mwe.com; IPR-Stratasys-MWE <IPR-Stratasys-MWE@mwe.com>
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[This email originated outside of F&R.]

Counsel,

Petitioner may respond with its position as to Patent Owner's request via email by Thursday, November 13th.

Thanks

From: Kapadia, Aashish <Akapadia@mwe.com>
Sent: Wednesday, November 12, 2025 9:21 AM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Josh Griswold <griswold@fr.com>; Kenneth Darby <kdarby@fr.com>; hawkins@fr.com;

xie@fr.com; IPR56224-0006IP1 <ipr56224-0006ip1@fr.com>; IPR56224-0013IP1 <ipr56224-0013ip1@fr.com>; Oaks, Brian <Boaks@mwe.com>; Kapadia, Aashish <Akapadia@mwe.com>; Meek, Kevin <Kmeek@mwe.com>; Fareed, Syed <Sfareed@mwe.com>; IPR-Stratasys-MWE <IPR-Stratasys-MWE@mwe.com>

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Honorable Director Squires,

Patent Owner in IPR2025-00257 and IPR2025-00611 respectfully requests authorization to submit briefing regarding Petitioner's differing claim construction positions between IPR and district court, which Petitioner must explain pursuant to *Revvo Technologies, Inc. v. Cerebrum Sensor Technologies, Inc.*, IPR2025-00632, Paper 20 (November 3, 2025) (designated: November 3, 2025) and *Tesla, Inc. v. Intellectual Ventures II LLC*, IPR2025-00340, Paper 18 (November 5, 2025) (designated: November 5, 2025).

For IPR2025-00257, Patent Owner previously requested Director Review, but due to this new precedent, it requests an additional five-page Director Review request as Petitioner has advanced that three terms of the challenged patent are indefinite in district court and yet maintains that no construction is necessary in IPR.

For IPR2025-00611, Patent Owner requests five-pages of supplemental briefing for its pending Director Review request as Petitioner has advanced that a term in claim 1 is indefinite in district court and yet maintains that no construction is necessary in IPR.

Patent Owner is not opposed to Petitioner receiving an equivalent number of pages in response.

Pursuant to these requests, Patent Owner respectfully requests authorization to submit Petitioner's publicly filed claim construction brief from the district court where Petitioner has taken different positions than those in IPR. See *Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd. et al.*, Case No. 2:24-cv-00644-JRG, Dkt. No. 105 ("Bambu's Responsive Claim Construction Brief") (Oct. 29, 2025).

Counsel for Patent Owner and counsel for Petitioner have communicated regarding Patent Owner's requests, but Patent Owner's counsel has not received Petitioner's position given Petitioner's vastly different time zone.

Respectfully submitted,
Aashish Kapadia, counsel for Patent Owner

Aashish Kapadia

McDermott Will & Schulte LLP

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