

From: [Director Discretionary Decision](#)
To: [Wayne Zou](#); [Director Discretionary Decision](#)
Cc: [FW-CLIENT-Pantech-OnePlus-Service](#); [Fussell, Tripp](#); [OnePlus-Pantech-IPR](#)
Subject: RE: IPR2025-00783 - Request for permission to file reply to Petitioner's Opposition Brief
Date: Monday, August 25, 2025 10:12:37 AM

Patent Owner is authorized to file a 1-page reply in IPR2025-00783, due no later than Wednesday, August 27, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 1-page sur-reply, due no later than Friday, August 29, 2025.

From: Wayne Zou <wayne.zou@bayes.law>
Sent: Friday, August 22, 2025 4:04 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: FW-CLIENT-Pantech-OnePlus-Service <Pantech-OnePlus-Service@mayerbrown.com>; Fussell, Tripp <JFussell@mayerbrown.com>; OnePlus-Pantech-IPR <OnePlus-Pantech-IPR@bayes.law>
Subject: RE: IPR2025-00783 - Request for permission to file reply to Petitioner's Opposition Brief

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Dear Honorable Director,

Petitioner disputes Patent Owner's allegations in the email. Patent Owner bears the burden to support any positions advanced in its DD Request with evidence, and any such evidence must be submitted with the DD Request at the time of filing. Absent a showing of good cause, Patent Owner cannot belatedly introduce new evidence to remedy its failure of proof.

Accordingly, Petitioner opposes Patent Owner's request for leave to file a reply and respectfully urges the Director not to permit Patent Owner to supplement the record with evidence that could and should have been presented earlier.

In the event the Director authorizes a reply, Petitioner requests leave to file a sur-reply of equal length.

Respectfully submitted,
Zhiwei Zou
Lead Counsel for Petitioner

Wayne Z. Zou, Ph.D.

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From: Fussell, Tripp <JFussell@mayerbrown.com>

Sent: Friday, August 22, 2025 3:51 PM

To: Director_Discretionary_Decision <director_discretionary_decision@uspto.gov>

Cc: FW-CLIENT-Pantech-OnePlus-Service <Pantech-OnePlus-Service@mayerbrown.com>; OnePlus-Pantech-IPR <OnePlus-Pantech-IPR@bayes.law>; Wayne Zou <wayne.zou@bayes.law>

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[EXTERNAL MESSAGE]

Dear Honorable Director,

Upon review of Petitioner's Opposition Brief in IPR2025-00783, Patent Owner identified two inaccurate facts. Petitioner was aware of these facts prior to submitting its opposition and thus Patent Owner was surprised to see the misstatements in the Opposition. On Aug. 21, Patent Owner raised these inaccurate facts with Petitioner asking that they be corrected. Petitioner refused. Patent Owner thus requests permission to file a very short (1 page or less) reply to correct the record. Petitioner opposes this request.

Respectfully submitted,

James A. Fussell, III (Tripp)

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