

From: [Director, Discretionary Decision](#)
To: [Ligotti, Andy](#); [Director, Discretionary Decision](#)
Cc: [Gordon, Lori A](#); [Alan, Doug](#); [Reddy, Srikanth K](#); [Drummond, Brian](#); [Konstantakopoulos, Theodoros](#); [Douglas, Christopher](#); [Griffin, Lauren](#); [Carlson, Erik](#); [Bean, Caleb](#); [Kyrakis, Sloane](#)
Subject: RE: Reply to Request for Discretionary Denial // IPR2025-00866, IPR2025-00867, IPR2025-00868, and IPR2025-00869
Date: Wednesday, August 27, 2025 9:08:01 AM

Patent Owner is authorized to file a 3-page reply in IPR2025-00866, -00867, -00868, and -00869, due no later than Tuesday, September 2, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 3-page sur-reply, due no later than Friday, September 5, 2025.

From: Ligotti, Andy <Andy.Ligotti@alston.com>

Sent: Tuesday, August 26, 2025 4:48 PM

To: Director, Discretionary Decision <Director_Discretionary_Decision@uspto.gov>

Cc: Gordon, Lori A <LoriGordon@goodwinlaw.com>; Kline, Doug <dkline@goodwinlaw.com>; Reddy, Srikanth K <SReddy@goodwinlaw.com>; Drummond, Brian <BDrummond@goodwinlaw.com>; Konstantakopoulos, Theodoros <tkonstantakopoulos@goodwinlaw.com>; Douglas, Christopher <Christopher.Douglas@alston.com>; Griffin, Lauren <Lauren.Griffin@alston.com>; Carlson, Erik <Erik.Carlson@alston.com>; Bean, Caleb <Caleb.Bean@alston.com>; Kyrakis, Sloane <Sloane.Kyrakis@alston.com>

Subject: Reply to Request for Discretionary Denial // IPR2025-00866, IPR2025-00867, IPR2025-00868, and IPR2025-00869

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Dear Acting Director,

Patent Owner respectfully requests authorization to file a reply to the request for discretionary denial in IPR2025-00866, IPR2025-00867, IPR2025-00868, and IPR2025-00869 to address the amended stipulation Petitioners introduced in their recently filed responses to the discretionary denial requests. See IPR2025-00866, Paper 10, at 25, EX1043; IPR2025-00867, Paper 10, at 25, EX-1045; IPR2025-00868, Paper 10, at 23-24, EX-1024; and IPR2025-00869, Paper 10, at 25, EX-1046. Good cause exists for a reply because Patent Owner could not have anticipated that Petitioners would revise the Sotera stipulations that had been included in the Petitions, and Patent Owner should have an opportunity to address these new stipulations.

Petitioners do not oppose this request for a reply to address the new stipulation. See IPR2025-00866, Paper 10, at 25 n. 1, EX-1044; IPR2025-00867, Paper 10, at 25 n. 1, EX-1046; IPR2025-00868, Paper 10, at 24 n. 1, EX-1025; and IPR2025-00869, Paper 10, at 25 n. 1, EX-1047. Petitioners further request leave to file a 3-page sur-reply brief limited to responding to the arguments raised in Patent Owner's reply. Petitioners propose that their brief be due 3 business days after Patent Owner files its reply brief. Patent Owner does not oppose Petitioners' request.

Accordingly, Patent Owner requests a 3-page reply and to file it within one week of receiving authorization and Petitioners request a 3-page sur-reply brief limited to responding to the arguments raised in Patent Owner's reply.

Thank you,

Andy

Back-Up Counsel for Patent Owner (admitted pro hac vice)

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