From:	Trials
To:	Joshua Stowell; Trials
Cc:	hamilton-ptab@perkinscoie.com; parker-ptab@perkinscoie.com; williams-ptab@perkinscoie.com; Joe Re; Brian Barnes
Subject:	RE: Imperative Care v. Inari Medical - IPR2025-00989 - Request to File Reply to the POPR
Date:	Thursday, September 25, 2025 10:47:37 AM
Attachments:	image001.png

Counsel,

Petitioner is authorized to file a preliminary reply of no more than five pages that addresses items numbered 1 and 2 in Petitioner's email request. The preliminary reply is due no later than October 3, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

UNITED STATES PATENT AND TRADEMARK OFFICE

From: Joshua Stowell <Joshua.Stowell@knobbe.com>
Sent: Wednesday, September 24, 2025 7:28 PM
To: Trials <Trials@USPTO.GOV>
Cc: hamilton-ptab@perkinscoie.com; parker-ptab@perkinscoie.com; williams-ptab@perkinscoie.com; Joe Re <Joe.Re@knobbe.com>; Brian Barnes <Brian.Barnes@knobbe.com>
Subject: Imperative Care v. Inari Medical - IPR2025-00989 - Request to File Reply to the POPR

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RE: Imperative Care, Inc. v. Inari Medical, Inc., IPR2025-00989

Dear PTAB Trials,

Petitioner requests leave to file a 5-page reply brief to Patent Owner's Preliminary Response ("POPR") pursuant to 37 CFR § 42.108(c) to respond to the arguments identified below. The parties have met and conferred, and Patent Owner does not oppose this request. Patent Owner's counsel is CC'd on this email.

Petitioner's reply will address the following issues in the POPR:

1. Patent Owner's characterizations of Mr. Thornton's deposition testimony in related IPR2024-01157 and IPR2025-00156 identified at pages 46, 49-50, 63, 65-66, 69-70 of the POPR. Petitioner contends good cause exists for a reply on this issue because the deposition in IPR2025-00156 occurred after Petitioner filed the Petition and because Petitioner has not had an opportunity to address Patent Owner's characterizations of the testimony from either IPR.
2. Patent Owner's argument regarding the qualifications of a person of ordinary skill in the art. Petitioner contends good cause exists for a reply because Patent Owner's expert, Paul Zalesky, has provided testimony since the filing of the Petition that Petitioner contends is relevant to this issue. Petitioner also seeks leave to file as a new exhibit the Transcript from the Deposition of Paul Zalesky dated June 23, 2025 (IPR2024-01157) with its reply.

Petitioner proposes to file the reply within one week of any order authorizing the reply.

If the Board would like to conduct a hearing to discuss this request, the parties are available at the following times for the requested conference call (all times eastern):

Monday, September 29: 1 p.m.-5 p.m. (ET)
Tuesday, September 30: 1 p.m.- 3 p.m. (ET)
Wednesday, October 1: 1 p.m.-5 p.m. (ET)

Best Regards,

Joshua Stowell
Counsel for Petitioner Imperative Care, Inc.

Joshua Stowell
Partner
Joshua.Stowell@knobbe.com

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