

From: [Director Discretionary Decision](#)
To: [Ari J. Jaffess](#); [Director Discretionary Decision](#)
Cc: [Bluestone, David](#); [McMahon, Charles](#); [DaMario, Thomas](#); [Hemphill, Carlton](#); [Ronald Abramson](#); [Gina Kim](#); [M. Michael Lewis](#); [Amanda Sewanan](#); [Timothy Gilman](#); [Daniel Apgar](#)
Subject: RE: IPR2025-01019 - PO Request for Additional Briefing on Discretionary Denial
Date: Thursday, September 25, 2025 12:21:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Patent Owner is authorized to file a 5-page reply in IPR2025-01019 due no later than Monday, September 29, 2025, limited to addressing the arguments raised below.

From: Ari J. Jaffess <ari.jaffess@listonabramson.com>
Sent: Thursday, September 25, 2025 11:07 AM
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Honorable Director:

Patent Owner in IPR Case No. IPR2025-01019, RE Secured Networks, LLC, respectfully requests authorization to file a five-page reply brief on the issue of discretionary denial of institution, pursuant to the Interim Director Discretionary Process.

In particular, Patent Owner requests authorization to address the following points, each of which constitutes good cause for additional briefing:

1. New arguments and evidence submitted in Petitioner's response brief regarding the parallel litigation, including the incorrect argument that the trial date in the parallel litigation is likely to be extended (Response at 1-5), and recent further developments in the parallel litigation beyond those discussed in the response brief;
2. The stipulation newly submitted in Petitioner's response brief (Response at 5); and
3. Settled Expectations caselaw cited in Petitioner's response brief that did not exist at the time of Patent Owner's request for discretionary denial of institution and related arguments (Response at 6-8).

Respectfully submitted,

Ari J. Jaffess

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