

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WISE PLC,

Petitioner,

v.

INTERCURRENCY SOFTWARE LLC,

Patent Owner.

IPR2025-01045

U.S. Patent No. 11,620,701 B1

PETITIONER'S REQUEST FOR REFUND

In view of the Patent Trial and Appeal Board’s Decision granting Petitioner’s motion to withdraw its petition (filed two weeks after having filed its petition) and terminating this proceeding (Paper No. 5), Petitioner Wise PLC respectfully requests a refund in the amount of at least \$28,125.00 for the *inter partes* review post-institution fee previously paid by Petitioner. In light of the unique circumstances presented in this matter given the timing of the motion to withdraw, Petitioner further respectfully requests the Board to consider refunding that portion of the \$23,750.00 *inter partes* review request fee the Board deems reasonable under the circumstances.

On May 30, 2025, Petitioner filed a petition (“the Petition”) for *inter partes* review of U.S. Patent No. 11,620,701 (the “’701 Patent”). Two weeks later (on June 12, 2025) and before a filing date had been accorded for this Petition, Petitioner notified the Board that Petitioner and Patent Owner had reached a settlement regarding the ’701 Patent, and Petitioner requested authorization to file a motion to withdraw the Petition. On June 16, 2025, the Board granted Petitioner authorization to file its motion to withdraw and accorded the Petition a filing date. Petitioner filed its motion to withdraw that day.

When filing the Petition, in accordance with the fee schedule specified in 37 C.F.R. § 42.15(a), Petitioner deposited an electronic payment, including \$23,750 for fees associated with Petitioner’s request for review and \$28,125 for *inter partes* review post-institution fees. On July 3, 2025, the Board entered a Decision granting

Petitioner's motion to withdraw its petition and terminating this proceeding. *See* Paper No. 5. Petitioner is therefore entitled to a refund of the post-institution fees in the total amount of \$28,125.00.

Additionally, given that Petitioner sought to withdraw the Petition within two weeks of its filing and before the Petition had been accorded a filing date, and given that Petitioner's motion to withdraw was granted within approximately one month of the Petition being filed and before the Board reached the merits of the petition, Petitioner respectfully requests a refund of whatever portion of the \$23,750.00 *inter partes* review request fee the Board deems reasonable under the circumstances.

Accordingly, Petitioner respectfully requests that the Board grant this request for refund, and credit a refund for the *inter partes* review post-institution fee in the amount of \$28,125.00 to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P., plus whatever portion of the \$23,750.00 *inter partes* review request fee the Board deems reasonable under the circumstances.

Respectfully submitted,

BAKER BOTTS L.L.P.

/Clarke W. Stavinoha/

Clarke W. Stavinoha (Reg. No. 71,152)

Lead Counsel for Petitioner

Date: July 3, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on July 3, 2025, a complete and entire copy of this **PETITIONER'S REQUEST FOR REFUND** was served on Patent Owner via Federal Express, postage prepaid, at the correspondence address of record for the '701 Patent:

Joe Zheng
LogicPatents, LLC
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Cupertino, CA 95015

Respectfully submitted,
BAKER BOTTS L.L.P.

/Clarke W. Stavinoha/
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