

From: [Director_PTABDecision_Review](#)
To: "Modi, Naveen"; Chris Evans; Bansal, Chetan R.; Ginger Turner; PH-Samsung-CMHK-IPR; Laurenzi, Robert
Subject: RE: IPR2025-01023/IPR2025-1071: Request for Reply ISO of Director Review - Denied
Date: Monday, January 26, 2026 6:51:00 AM

Counsel,

Patent Owner's request to submit a reply brief in support of its request for Director Review in the above identified proceedings is denied.

Thanks,

IPR2025-01023 and IPR2025-01071
Ex.3101

From: Modi, Naveen <naveenmodi@paulhastings.com>
Sent: Tuesday, January 20, 2026 4:55 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Chris Evans <chris@offorevans.com>; Bansal, Chetan R. <chetanbansal@paulhastings.com>; Ginger Turner <ginger@gingineerllc.com>; PH-Samsung-CMHK-IPR <PH-Samsung-CMHK-IPR@paulhastings.com>; Laurenzi, Robert <robertlaurenzi@paulhastings.com>
Subject: RE: IPR2025-01023/IPR2025-1071: Request for Reply ISO of Director Review

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Honorable Director Squires,

Petitioner opposes Patent Owner's request. Patent Owner has already twice tried to frame Samsung as having taken inconsistent positions. Each time, the Board has found those accusations meritless. (See IPR2025-01023, Paper No. 17 at 21 (finding that Petitioner did not argue the term "predicted axial accelerations" is "indefinite"), 21 n. 9 (finding that Patent Owner's *unauthorized* arguments submitted after the preliminary response also fail to show any inconsistency in Petitioner's arguments). Patent Owner's third attempt at manufacturing an inconsistency in Petitioner's claim construction positions based on a single isolated statement in Petitioner's Response (Paper 20) does not warrant any additional briefing especially when the sentence at issue ("there is no requirement that Bassompierre disclose each of the three types of acceleration") is about the prior art and does not offer a construction of the claim term at issue. Ultimately, this issue is better left for trial where the Board can analyze the full context of this statement and the other document (Samsung's non-infringement report) cited by Patent Owner should Patent Owner decide to raise this alleged inconsistency in its Patent Owner response.

To the extent the Director grants additional briefing to Patent Owner, Petitioner requests a commensurate response.

Respectfully Submitted,
Naveen Modi
Counsel for Petitioner Samsung

Naveen Modi
Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Friday, January 16, 2026 12:30 PM
To: Chris Evans <chris@offorevans.com>; Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Bansal, Chetan R. <chetanbansal@paulhastings.com>; Ginger Turner <ginger@gingineerllc.com>; PH-Samsung-CMHK-IPR <PH-Samsung-CMHK-IPR@paulhastings.com>; Laurenzi, Robert <robertlaurenzi@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>
Subject: [EXT] RE: IPR2025-01023/IPR2025-1071: Request for Reply ISO of Director Review

Counsel,

Petitioner may respond with its position as to Patent Owner's request *via* email by Tuesday, January 20, 2026.

Thank you.

From: Chris Evans <chris@offorevans.com>
Sent: Friday, January 16, 2026 12:02 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Bansal, Chetan R. <chetanbansal@paulhastings.com>; Ginger Turner <ginger@gingineerllc.com>; PH-Samsung-CMHK-IPR <PH-Samsung-CMHK-IPR@paulhastings.com>
Subject: IPR2025-01023/IPR2025-1071: Request for Reply ISO of Director Review

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Dear Director,

Patent Owner CM HK Limited respectfully requests authorization to file a 2-page reply brief in support of its request for Director Review. Paper 18. Patent Owner understands the extraordinary nature of its request.

In its opposition (Paper 20), Samsung articulated a new claim construction that conflicts with the "plain and ordinary" meaning that Samsung advocated for in the CyWee case (after claim construction order issued), as shown below:

Paper 20 at 7 (emphasis added)	Samsung's Noninfringement Report from CyWee Litigation at ¶ 203
Specifically, Patent Owner contends that " Bassompierre's gravity-only prediction does not disclose 'predicted axial accelerations' that 'encompass three types of acceleration,' as Petitioner's proposed construction requires." ... While it is true that "axial accelerations" can be one of three types of acceleration, there is no requirement that Bassompierre disclose each of the three types of acceleration , as Patent Owner's argument appears to require.	Per Judge Bryson's opinion, the term "axial acceleration" encompasses the composite acceleration value (linear, centrifugal, and/or gravitational) that may be detected by an accelerometer at a particular point in time. A "predicted axial acceleration" can only reasonably be interpreted as a prediction of this composite value, not the gravitational acceleration component isolated from that composite value.

This inconsistency is not apparent from the existing Director Review record and could not have been addressed in Patent Owner's request. Patent Owner therefore seeks leave to file a narrowly tailored, reply limited solely to identifying the claim construction newly advanced in Samsung's opposition and contrasting it with Samsung's prior expert testimony. This reply would require submission of a single new exhibit consisting of the relevant excerpts from Samsung's prior expert report.

Sincerely,

Chris Evans

Counsel for Patent Owner CM HK Ltd.

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