From: Trials <Trials@USPTO.GOV>
Sent: Tuesday, December 9, 2025 3:15 PM
To: Jennifer; Daniel; Timothy; Benjamin; Dan; Angelo; CT-SamsungOmniMedsci; Daniel Kim; Frances Zhang; JVidwan@mayerbrown.com; RPluta@mayerbrown.com; jasmith@fr.com; rbonilla@fr.com; jshaw@cjsjlaw.com; James Davis
Cc: Trials
Subject: RE: IPR2025-01249 to -01254 & PGR2025-00063 to -00064 - Samsung Electronics Co., Ltd. et al. v. Omni Medsci, Inc.

Counsel,

This email regards only IPR2025-01250, IPR2025-01251, IPR2025-01252, IPR2025-01253, and IPR2025-01254.

The parties' correspondence below appears to implicate the recent precedential decision in Revvo Technologies, Inc. v. Cerebrum Sensor Technologies, Inc., IPR2025-00632, Paper 20 (Nov. 3, 2025), and the recent informative decision in Tesla, Inc. v. Intellectual Ventures II LLC, IPR2025-00340, Paper 18 (Nov. 5, 2025)). The parties are authorized to file an additional brief in each of the above-referenced proceedings to address the impact of the Revvo and Tesla decisions on these proceedings, including the changed district court circumstances. Briefing may not address any other issues.

Each party is granted 5 pages of additional briefing in each case. Petitioner's brief is due no later than the close of business on Friday, December 12, 2025. Patent Owner's brief is due no later than the close of business on Wednesday, December 17, 2025.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
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uspto UNITED STATES PATENT AND TRADEMARK OFFICE

From: James Davis <JDavis@sheppardmullin.com>
Sent: Tuesday, November 25, 2025 4:20 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Hayes, Jennifer <jenhayes@nixonpeabody.com>; Stringfield, Daniel <dstringfield@nixonpeabody.com>; Maloney, Timothy <tmaloney@nixonpeabody.com>; Holt, Benjamin <bholt@nixonpeabody.com>; Georgiev, Dan <dgeorgiev@nixonpeabody.com>; Christopher, Angelo <achristopher@nixonpeabody.com>; CT-SamsungOmniMedsci <CT-SamsungOmniMedsci@sheppardmullin.com>; Daniel Kim <HyKim@sheppardmullin.com>; Frances Zhang <FZhang@sheppardmullin.com>; JVidwan@mayerbrown.com; RPluta@mayerbrown.com; jasmith@fr.com;

rbonilla@fr.com; jshaw@cjsjlaw.com
Subject: IPR2025-01249 to -01254 & PGR2025-00063 to -00064 - Samsung Electronics Co., Ltd. et al. v. Omni Medsci, Inc.

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To the Honorable Director,

Petitioners seek leave to submit an updated mandatory notice in these proceedings indicating that "no indefiniteness dispute remains" between the parties as already indicated in the district court claim construction exchanges between the parties prior to the relevant POPRs (see Ex. 1120, IPR2025-01251 – 01254 & PGR2025-00063 – 00064). These exchanges are required to include any indefiniteness positions pursuant to EDTX Local Rule 4-1. While a single indefiniteness issue was raised as to one challenged claim (dependent claim of the '475 patent) in Petitioners' Oct. 31, 2025 claim construction exchange (Ex. 2034 at 18), that indefiniteness position was withdrawn prior to the submission of the POPR for that patent (Ex. 1120, IPR2025-01254).

The parties have conferred, and Patent Owner does not oppose Petitioners' request as indicated below. Per Patent Owner's request, Petitioners are willing to stipulate that Petitioners will not raise any indefiniteness arguments in the parallel district court proceeding as to any claims subject to an instituted IPR or PGR in these proceedings.

Patent Owner has provided the following position:

> Petitioners mischaracterize the facts and the law. Petitioners did not and have not withdrawn their indefiniteness invalidity contentions in the Eastern District of Texas. Petitioners also mischaracterize the impact of their withdrawal of indefiniteness contentions in claim construction but not from the invalidity contentions. Contrary to Patent Owner's representations to the Board, Petitioners may still raise indefiniteness in the Texas case in certain circumstances.
>
> Nevertheless, Patent Owner does not oppose Petitioner's request to submitted an updated mandatory notice. However, Patent Owner notes that Petitioner is limiting its stipulation to only claims that are instituted and therefore has no bearing on the pending Discretionary Denial briefs.

The parties are available for a call if preferred.

Respectfully submitted,
Jim Davis
Counsel for Petitioners

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