

From: [Director Discretionary Decision](#)
To: [Steve Schreiner](#); [Trials](#); [Director DI](#); [Director Discretionary Decision](#)
Cc: [USAA-IPRs](#); [T Rowles](#); [Jonathan Lindsay](#); [Carmichael, Jim \(External\)](#); [Mitch Yang](#); [J Sheasby](#); [Lisa Glasser](#); [USAA-IPRs@irell.com](#); [Cavanaugh, David](#); [Lantier, Gregory](#); [Danford, Andrew J](#); [Nemtzow, Alex](#); [Sewall, Michaela P.](#); [Israelsen, R. Gregory](#)
Subject: RE: Request for Reply on Discretionary Denial in IPR2025-01326 ('310 Patent), Regions Bank v. USAA
Date: Tuesday, November 18, 2025 9:31:47 AM
Attachments: [image001.png](#)

Patent Owner is authorized to file a 5-page reply in IPR2025-01326 and IPR2025-01356, due no later than Thursday, November 20, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 5-page sur-reply, due no later than Monday, November 24, 2025.

From: Steve Schreiner <schreiner@carmichaelip.com>
Sent: Monday, November 17, 2025 5:18 PM
To: Trials <Trials@USPTO.GOV>; Director_DI <Director_DI@uspto.gov>; Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
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Subject: Request for Reply on Discretionary Denial in IPR2025-01326 ('310 Patent), Regions Bank v. USAA

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Dear Director Squires:

Patent Owner United Services Automobile Association (USAA) respectfully requests authorization to file a reply to Petitioner's Opposition to Patent Owner's Request for Discretionary Denial, Paper 12, in IPR2025-01326 ('310 Patent).

The purpose of the reply is to address new issues and arguments raised in the opposition, including: (1) the assertion that prior IPRs on different patents had "claims reciting the same subject matter" as the claims of the '310 Patent; (2) the assertion that the examiner committed material error; (3) the submission of a claim chart comparing limitations of claims pieced together from four USAA patents to Claim 1 of the '310 Patent; (4) the failure to identify the limitations found in Claim 1 of the '310 Patent not found in the claims of the patents from the cited prior IPRs; and (5) the assertion that there will "no inefficiency" created by Petitioner's standard *Sotera* stipulation and the related assertion that there is no overlap

between Petitioner's invalidity theories presented in the IPR petition versus those presented in the parallel district court action.

Patent Owner also submits that a reply is appropriate to address the guidance provided by the Director in the "Open Letter From America's Innovation Agency" issued on October 17, 2025, after Patent Owner submitted its request.

Patent Owner submits that the new issues/arguments and Director's guidance provide a good cause basis for Patent Owner's reply.

Considering the number and significance of the new issues/arguments, Patent Owner requests 8 pages for the reply. Patent Owner does not oppose a sur-reply for Petitioner of the same length.

Petitioner does not believe that there is good cause for a reply and opposes the request for 8 pages. However, Petitioner would not oppose a reply of 3 pages provided that Petitioner is allowed a sur-reply of equal length.

Very respectfully,

Stephen Schreiner
Counsel for Patent Owner



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