

From: [Director Discretionary Decision](#)
To: [Alexis Ritzer](#); [Director Discretionary Decision](#); [Director DI](#)
Cc: [Greg Gardella](#); [Cook Alciati](#); [Gardella Alciati Litigation](#); [dblock-PTAB@sternekessler.com](#); [jchagnon-PTAB@sternekessler.com](#); [jwang-PTAB@sternekessler.com](#); [PTAB Account](#)
Subject: RE: PO Reply Authorization Request for IPR2025-01357, -01358, -01359, -01360
Date: Thursday, November 13, 2025 3:40:19 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Patent Owner is authorized to file a 5-page reply in IPR2025-01357, -01358, -01359, and -01360, due no later than Monday, November 17, 2025, limited to addressing the arguments raised below. Petitioner is authorized to file a 5-page sur-reply, due no later than Wednesday, November 19, 2025.

From: Alexis Ritzer <aritzer@ga-iplaw.com>
Sent: Wednesday, November 12, 2025 3:46 PM
To: Director_DI <Director_DI@uspto.gov>
Cc: Greg Gardella <ggardella@ga-iplaw.com>; Cook Alciati <calciati@ga-iplaw.com>; Gardella Alciati Litigation <litigation@ga-iplaw.com>; [dblock-PTAB@sternekessler.com](#); [jchagnon-PTAB@sternekessler.com](#); [jwang-PTAB@sternekessler.com](#); PTAB Account <ptab@sternekessler.com>
Subject: PO Reply Authorization Request for IPR2025-01357, -01358, -01359, -01360

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To the Honorable Director:

Patent Owner Aon Re, Inc. respectfully seeks leave to file a pre-institution reply to Petitioner's Opposition to Patent Owner's Request for Discretionary Denial in the following four IPR proceedings: IPR2025-01357, IPR2025-01358, IPR2025-01359, and IPR2025-01360. Specifically, Patent Owner requests authorization to address: 1) arguments Petitioner could have made in the Petition, but did not (e.g., alleged examiner error, explanation of its claim construction positions relative to other proceedings); 2) various misstatements by Petitioner concerning the parties' pre-suit discussions; and 3) Petitioner's mischaracterizations of its Petition arguments. Patent Owner submits that there is good cause for the additional briefing because these issues are important and could not have been addressed earlier by Patent Owner.

Patent Owner respectfully seeks a reply of up to seven pages with the ability to submit a limited number of additional exhibits to rebut arguments Petitioner made in its opposition brief, due one week from the date of any order authorizing the reply. Patent Owner does not oppose a sur-reply from Petitioner of equal length and on the same timeline as Patent Owner's proposal.

Petitioner opposes the requested relief and has asked Patent Owner to note Petitioner's position as follows: "As Petitioner repeatedly emphasized in its opposition to discretionary denial, many of the arguments in that opposition were already in its Petition. However, should the Director be inclined to grant Patent Owner's request, Petitioner also requests a sur-reply."

The parties are available for a call should it be determined that a call is necessary to address Patent

Owner's request.

Respectfully,
Alexis L. Ritzer
Backup counsel for Patent Owner Aon Re, Inc.

Alexis Ritzer | Attorney | GA-IPLaw.com

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