

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AIRWALLEX PTY. LTD,
Petitioner

v.

INTERCURRENCY SOFTWARE LLC,
Patent Owner.

Case IPR2025-01446
U.S. Patent No. 11,620,701

PETITIONER'S REQUEST FOR REFUND

In view of the Patent Trial and Appeal Board’s Decision granting Petitioner’s unopposed motion to withdraw its petition (filed two and a half weeks after the filing of its Petition) and terminating this proceeding (Paper No. 6), Petitioner Airwallex Pty. Ltd. (“Airwallex”) respectfully requests a refund of the \$28,125.00 *inter partes* review post-institution fees. Airwallex further respectfully requests that the Board consider refunding a portion of the \$23,750.00 *inter partes* review request fee that it deems reasonable under the circumstances.

On August 29, 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 September 11, 2025), 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 September 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 same day.

When filing the Petition, in accordance with the fee schedule specified in 37 C.F.R. § 42.15(a), Petitioner made an electronic payment, including \$23,750.00 for fees associated with Petitioner’s request for review and \$28,125.00 for *inter partes* review post-institution fees. On October 2, 2025, the Board entered a Decision granting Petitioner’s motion to withdraw its Petition and terminating this

proceeding. See Paper No. 6. 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 three weeks of its filing, and given that Petitioner's motion to withdraw was granted a little over a month after filing, before the Board reached a decision on 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. DA1300190 of MAYER BROWN LLP, plus whatever portion of the \$23,750.00 *inter partes* review request fee the Board deems reasonable under the circumstances.

Dated: October 2, 2025

Respectfully submitted,

By: /B. Clayton McCraw/

B. Clayton McCraw

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Counsel for Petitioner Airwallex Pty. Ltd.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 2, 2025, a complete and entire copy of this PETITIONER’S REQUEST FOR REFUND was served on Patent Owner via electronic mail at the following addresses:

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ghintercurrency@ghiplaw.com

Dated: October 2, 2025

By: /B. Clayton McCraw/
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