

From: [Kellogg, Andrew](#)
To: [Trials](#); [Andrews, Jeff](#)
Cc: [collard.case@dorsey.com](#); [george.payton@dorsey.com](#); [vanderwoude.brian@dorsey.com](#); [Riddle, Robert R.](#); [jphillips@spencerfane.com](#); [jblack@reedsmith.com](#); [jdetrixhe@reedsmith.com](#)
Subject: RE: Request for leave to file Reply | IPR2025-01454
Date: Monday, January 5, 2026 1:31:12 PM
Attachments: [image001.png](#)

Counsel,

Petitioner is authorized to file their reply to file their 5-page primary reply January 7th. Patent Owner's 5-page preliminary sur-reply is due no later than January 12. We apologize for any confusion.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
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(571) 272-5366

IPR2025-01454
Ex. 3102



From: Trials
Sent: Friday, January 2, 2026 10:51 AM
To: 'Andrews, Jeff' <jandrews@yettercoleman.com>; Trials <Trials@USPTO.GOV>
Cc: [collard.case@dorsey.com](#); [george.payton@dorsey.com](#); [vanderwoude.brian@dorsey.com](#); [Riddle, Robert R.](#) <rriddle@reedsmith.com>; [jphillips@spencerfane.com](#); [jblack@reedsmith.com](#); [jdetrixhe@reedsmith.com](#)
Subject: RE: Request for leave to file Reply | IPR2025-01454

Counsel,

Petitioner is authorized to file a 5-page preliminary reply in IPR2025-01454, due no later than January 5, 2026, limited to addressing the issues identified below. Patent Owner is authorized to file a 5-page preliminary sur-reply due no later than January 8, 2026, limited to addressing the same issues.

The parties should file their briefs as papers in P-TACTS.

Regards,

Andrew Kellogg,

Deputy Chief Clerk, Trials
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From: Andrews, Jeff <jandrews@yettercoleman.com>
Sent: Thursday, December 11, 2025 1:34 PM
To: Trials <Trials@USPTO.GOV>
Cc: collard.case@dorsey.com; george.payton@dorsey.com; vanderwoude.brian@dorsey.com;
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Subject: Request for leave to file Reply | IPR2025-01454

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Re: IPR2025-01454

Honorable Board:

Petitioner respectfully requests authorization to file a short reply to the Preliminary Response, limited to 6 pages and filed within 5 days of authorization, to address a discrete claim construction issue newly raised in Patent Owner's Preliminary Response (Paper No. 8). Good cause exists because Patent Owner's Preliminary Response newly advances a narrow construction of "furnace" purportedly based on an express definition in the specification and supported by new extrinsic evidence in the form of a 30-page expert declaration. Patent Owner pairs its new position and evidence with a procedural assertion that the Petition failed to comply with the petition rule on claim construction. Additionally, on Dec. 9, Patent Owner filed counterclaims alleging Petitioner infringes the '168 Patent in a co-pending litigation between the parties. Patent Owner applied the term "furnace" in a manner inconsistent with its position in its preliminary response.

Petitioner's reply will assist the Board by showing (1) that no construction is necessary for institution because the Petition demonstrates a reasonable likelihood of success under any plausible reading by directing the Board to record evidence that the asserted references disclose the very fired heater equipment Patent Owner lists, (2) that Patent Owner, despite its reliance on new testimonial evidence, has not met its burden to establish that the specification clearly redefines "furnace" to displace its ordinary meaning and (3) Patent

Owner's application of the claim term "furnace" in its newly filed infringement allegations is consistent with the petition. The reply will not add new prior art or new grounds and will rely solely on the existing record.

Patent Owner does not oppose Petitioner's request for leave to file a reply to the Patent Owner's Preliminary Response as outlined here. Petitioner has agreed not to oppose a request, to be presented to the Board at a later date, by Patent Owner to file a 3-page sur-reply to Petitioner's reply.

Sincerely,
Jeff Andrews
Counsel for Petitioner

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