

From: [Director Discretionary Decision](#)
To: [Director DI](#); [Director Discretionary Decision](#); [Ferraro, Vincent M.](#)
Cc: [Zinna, Michael](#); [Bapna, Abhi](#); [Ferraro, Vincent M.](#); jasone-ptab@sternekessler.com; lkenton-ptab@sternekessler.com; tdutton-ptab@sternekessler.com; jselep-ptab@sternekessler.com; bmendenhall-ptab@sternekessler.com; [PTAB Account](#)
Subject: RE: IPR2026-00108
Date: Friday, February 20, 2026 10:26:18 AM

Patent Owner may file the District Court's Order as an exhibit. No additional briefing is authorized at this time.

From: Ferraro, Vincent M. <VFerraro@KelleyDrye.com>
Sent: Thursday, February 19, 2026 6:26 PM
To: Trials <Trials@USPTO.GOV>
Cc: Zinna, Michael <MZinna@KelleyDrye.com>; Bapna, Abhi <ABapna@KelleyDrye.com>; Ferraro, Vincent M. <VFerraro@KelleyDrye.com>; jasone-ptab@sternekessler.com; lkenton-ptab@sternekessler.com; tdutton-ptab@sternekessler.com; jselep-ptab@sternekessler.com; bmendenhall-ptab@sternekessler.com; PTAB Account <ptab@sternekessler.com>
Subject: IPR2026-00108

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Dear Honorable Board,

On behalf of Patent Owner Motive Technologies, Inc., we respectfully request authorization to file a short Notice of Supplemental Authority (1-2 pages) in the above-captioned proceeding.

On February 6, 2026, after Patent Owner submitted its Request for Discretionary Denial brief on January 26, 2026 (Paper 7), the district court in the parallel litigation involving the challenged patent (*Motive Technologies, Inc. v. Samsara, Inc.*, Case No. 3:24-cv-00902 (N.D. Cal.)) denied Petitioner's motion to stay. Patent Owner thus seeks authorization to submit a Notice of Supplemental Authority so that the district court's order denying Petitioner's motion to stay may be made part of the record and the Director's discretionary denial decision may be based on a complete and current factual record. As the Board knows, the stay of a corresponding district court litigation is a factor in considering discretionary denial.

If authorized, Patent Owner proposes to file a short Notice of Supplemental Authority attaching the district court's order and briefly identifying its relevance, without additional argument. All parties are copied on this email. Petitioner opposes this request and, when asked, refused to provide dates of availability for a teleconference should the Board determine that one is necessary.

Thank you for your consideration.

Respectfully submitted,

/Vincent M. Ferraro/

Vincent M. Ferraro

Reg. No. 79,197

Lead Counsel for Patent Owner Motive Technologies, Inc.

VINCENT FERRARO

Special Counsel

Kelley Drye & Warren LLP

7 Giralda Farms, Suite 340

Madison, NJ 07940

Tel: (973) 503-5927

vferraro@kelleydrye.com

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