

From: [Director Discretionary Decision](#)
To: [Michael Kiklis](#); [Director Discretionary Decision](#)
Cc: [Piana, Jayne C.](#); [Google-Gamba-BR](#); baluch@smithbaluch.com
Subject: RE: IPR2026-00156 -- Request for authorization to file Reply
Date: Thursday, April 9, 2026 2:55:49 PM

Apologies for the error.

Patent Owner may file a 6-page reply in IPR2026-00156, due no later than Monday, April 13, 2026, limited to addressing the matters raised below. Petitioner is authorized a 6-page sur-reply, due no later than Thursday, April 16, 2026.

From: Michael Kiklis <mike@kiklislaw.com>
Sent: Thursday, April 9, 2026 2:40 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Piana, Jayne C. <JPiana@brownrudnick.com>; Google-Gamba-BR <Google-Gamba-BR@brownrudnick.com>; baluch@smithbaluch.com
Subject: Re: IPR2026-00156 -- Request for authorization to file Reply

You don't often get email from mike@kiklislaw.com. [Learn why this is important](#)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Director Squires,

I respectfully request clarification. I think the email has a typographical error because Monday is April 13 and Thursday is April 16. I think the email was intended to make the deadline for the reply on Monday, April 13 and the surreply deadline on Thursday, April 16. Please confirm if that is correct.

Respectfully submitted,

Michael Kiklis

Michael L. Kiklis
Kiklis Law Firm, PLLC
1800 Diagonal Rd., Suite 600
Alexandria, VA 22314
Phone: (703) 647-6205

Mobile: (202) 262-5741

Email: mike@kiklislaw.com

Website: kiklislaw.com

On Thu, Apr 9, 2026 at 1:56 PM Director_Discretionary_Decision

<Director_Discretionary_Decision@uspto.gov> wrote:

Patent Owner may file a 6-page reply in IPR2026-00156, due no later than Monday, April 11, 2026, limited to addressing the matters raised below. Petitioner is authorized a 6-page sur-reply, due no later than Thursday, April 14, 2026.

From: Michael Kiklis <mike@kiklislaw.com>

Sent: Tuesday, April 7, 2026 1:24 PM

To: Piana, Jayne C. <JPiana@brownrudnick.com>

Cc: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>; Google-Gamba-BR <Google-Gamba-BR@brownrudnick.com>; baluch@smithbaluch.com

Subject: Re: IPR2026-00156 -- Request for authorization to file Reply

You don't often get email from mike@kiklislaw.com. [Learn why this is important](#)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Director Squires,

Patent Owner did not request Petitioner's position before submitting the request to the Director. Nevertheless, Petitioner does not oppose the request for a reply brief. If the Director grants the request, Petitioner respectfully requests authorization to file a sur-reply of similar page length (6 pages) to respond to the Reply.

Respectfully submitted,

Michael Kiklis

Lead counsel for Petitioner, Google

Reg. No. 38,939

Michael L. Kiklis

Kiklis Law Firm, PLLC

[1800 Diagonal Rd., Suite 600](#)

[Alexandria, VA 22314](#)

Phone: (703) 647-6205

Mobile: (202) 262-5741

Email: mike@kiklislaw.com

Website: kiklislaw.com

On Tue, Apr 7, 2026 at 12:45 PM Piana, Jayne C. <JPiana@brownrudnick.com> wrote:

Dear Honorable Director,

Patent Owner (“PO”) respectfully requests authorization to file a six-page Reply limited to the discrete points below in Petitioner’s Opposition (Paper 7) to PO’s Discretionary Denial brief. PO submits good cause exists for each of these points.

1. Petitioner’s arguments regarding alleged deceit by PO (Opposition, 3-9): Good cause exists because Petitioner’s position that the inventor deceived the Patent Office during prosecution based on allegedly defective priority claims and improperly added new matter to divisional applications are not arguments in the Petition, nor could they have been reasonably anticipated by PO. Indeed, Petitioner relies upon a new expert in its Opposition to opine on Patent Office procedures, submitting a 46-page declaration, despite the Director’s ability to understand such issues without expert testimony. PO should have the opportunity to respond to these serious allegations and new testimony.
2. Petitioner’s arguments regarding alleged Examiner error (Opposition, 9-13): Good cause exists because Petitioner’s argument that the Examiner of the ‘193 Patent failed to conduct a thorough search is unsupported, contradicts the record, and is inconsistent with the law and because Petitioner supports its argument with testimony from its new expert.
3. Petitioner’s arguments regarding Petitioner’s notice of the ‘193 Patent (Opposition, 13-14): Good cause exists because new evidence has been discovered showing direct contact between the PO and the Petitioner regarding the ‘193 Patent family.
4. Petitioner’s relationship with Samsung (Opposition, 16-17): Good cause exists because new evidence has been produced in the Samsung litigation showing that Google may be obligated to defend against Gamba’s claims of infringement of the ‘193 patent and indemnify Samsung for damages resulting from such infringement, showing that Samsung should have been named as a real party in interest to the Petition.

PO submits this request for authorization to file a reply complies with the process outlined by the Director: “Parties should request authorization to file a reply or sur-reply

as soon as practicable due to the time constraints on the discretionary considerations process. A party requesting briefing should send an email request, with a copy to counsel for all parties, to Director_Discretionary_Decision@USPTO.gov.”
<https://www.uspto.gov/patents/ptab/interim-director-discretionary-process>

Petitioner’s counsel is copied on this correspondence.

Thank you for your consideration.

Best regards,
Jayne Piana

brownrudnick

Jayne C. Piana

Partner
Chair of Patent Trial and Appeals Board (PTAB) Practice
Brown Rudnick LLP
M: 832.868.3379
jpiana@brownrudnick.com
www.brownrudnick.com

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.
