

From: [Trials](#)
To: [Kaiser, Jessica \(Perkins Coie\)](#); [Trials](#)
Cc: [Ryan Richardson](#); [Carter, Jon R. \(Perkins Coie\)](#); [Jennifer Chagnon](#); [David Haars](#); [Wenhao Xiong](#); [PTAB Account](#); [kaiser-ptab@perkinscoie.com](#); [carter-ptab@perkinscoie.com](#); [lembo-ptab@perkinscoie.com](#); [Amazon-InterDigital-IPR@perkinscoie.com](#); [Emma Klemt](#); [Pekarekkrohn-ptab@perkinscoie.com](#)
Subject: RE: Amazon v. InterDigital IPRs: // Preliminary Reply Requests for IPR2026-00193 and IPR2026-00195
Date: Thursday, April 30, 2026 11:28:11 AM

Petitioner is authorized to file a 5-page preliminary reply in IPR2026-00193, due no later than May 5, 2026, limited to addressing issues (1)-(4) as set forth in Petitioner's email request to the Director dated 4/24/26. Patent Owner is authorized to file a 5-page preliminary sur-reply in IPR2026-00193 due not later than May 8, 2026, limited to addressing the same issues.

Petitioner is authorized to file a 5-page preliminary reply in IPR2026-00195, due no later than May 5, 2026, limited to addressing issues (1)-(3) as set forth in Petitioner's email request to the Director dated 4/24/26. Patent Owner is authorized to file a 5-page preliminary sur-reply in IPR2026-00195 due not later than May 8, 2026, limited to addressing the same issues.

The parties should file their briefs as papers in P-TACTS. The parties are not authorized to file any evidence at this time.

From: Kaiser, Jessica (Perkins Coie) <JKaiser@perkinscoie.com>
Sent: Friday, April 24, 2026 3:52 PM
To: Trials <Trials@USPTO.GOV>; Director_DI <Director_DI@uspto.gov>
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Subject: Amazon v. InterDigital IPRs: // Preliminary Reply Requests for IPR2026-00193 and IPR2026-00195

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Dear Director Squires,

Petitioner respectfully requests authorization to file a reply, not exceeding seven pages, to Patent Owner's Preliminary Response ("POPR") in each of IPR2026-00193 and IPR2026-00195. Petitioner proposes to file each reply within ten business days of receiving

authorization.

IPR2026-00193: Good cause exists for a reply because Petitioner could not have anticipated that the POPR would: (1) argue that Xiong does not disclose intra prediction for a 32x32 macroblock by relying solely on descriptions of background art in Xiong (*see* POPR, 20-21); (2) present argument regarding whether VCEG-AJ21 discloses intra prediction, when it was cited only to show a 64x64 macroblock to the extent Xiong did not disclose a 64x64 macroblock (*see* POPR, 27-28, 36-37); (3) cite out-of-context statements regarding VCEG-AJ21 made by an expert from a different IPR proceeding (*see* POPR, 27, 36-37); or (4) mischaracterize the Petition by arguing that it relies on `ext_16x16_pred_flag` to meet both the binary split signaling syntax element of limitation 1[b] and second syntax element of limitation 1[e] (*see* POPR, 3, 38-39).

IPR2026-00195: Good cause exists for a reply because Petitioner could not have anticipated that the POPR would: (1) misrepresent the Petition to contend that six limitations are missing from the prior art, based in part on an overly restrictive reading of the Director's guidance regarding the proper scope of expert testimony (POPR 11-26); (2) misrepresent the petition as to how "motion compensation interpolation" relates to "motion vectors" to argue (i) a combination of Nakagawa and Sita would be inoperable (POPR, 27-37), and (ii) also considering Fimoff's implementation of interpolation and motion vectors, that Fimoff fails to teach a vertical GFv filter (POPR, 45-51); and (3) contend that the Petition fails to show that (i) Sita teaches a combined filter (POPR, 37-45), and (ii) Wiegand and Davies were publicly accessible prior art (POPR, 51-55), due to an impermissible incorporation by reference of the expert declaration into the Petition.

Petitioner's replies will clarify the record regarding these issues. To avoid including unnecessary argument in this email, Petitioner does not detail here the specific merits regarding each issue.

Petitioner has conferred with Patent Owner, and Patent Owner opposes this request. Patent Owner opposes Petitioner's requests, which were received earlier this morning. Patent Owner does not believe that any of Petitioner's numerous alleged bases provide good cause for a reply in either proceeding. Patent Owner's 11 identified bases across the two proceedings represent nothing more than a disagreement between the parties on the merits of the asserted references and grounds. Petitioner's position that it could not have foreseen Patent Owner arguing against these merits is untenable. Patent Owner believes that the Director is perfectly well-suited to analyze the arguments to which Petitioner complains, and weigh the merits of the parties' respective positions based on the current record. However, should the Director believe that additional briefing is necessary on these issues, Patent Owner requests that it also be authorized to file a sur-reply to each of Petitioner's replies of equal length and with equal time to file.

Petitioner does not oppose Patent Owner's request for a sur-reply.

If the Director needs additional information regarding good cause to grant this request, Petitioner requests a conference call, and the parties will confer and provide times of mutual availability.

Best regards,

Jessica Kaiser

PARTNER

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