

From: [Director Discretionary Decision](#)
To: [Patrick Maloney](#); [Director Discretionary Decision](#)
Cc: [David Hecht](#); patents@hechtpartners.com; [Heintz, James M.](#); [Saulnier, Mike](#); [VandeVort, Peter](#); [Sung, Sangwon](#); [DLA-SamsungIPR-TVnGO](#)
Subject: RE: Patent Owner's Request for Reply in IPR2026-00213 and IPR2026-00214
Date: Tuesday, June 2, 2026 3:40:43 PM

Patent Owner is authorized to file a 3-page reply in IPR2025-00213 and IPR2026-00214, due no later than Friday, June 5, 2026, limited to addressing the arguments raised below. Petitioner is authorized to file a 3-page sur-reply, due no later than Tuesday, June 9, 2026. The parties are not authorized to include additional evidence or exhibits.

From: Patrick Maloney <PMaloney@corkmaloney.com>
Sent: Monday, June 1, 2026 12:48 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: David Hecht <dhecht@hechtpartners.com>; patents@hechtpartners.com; Heintz, James M. <jim.heintz@us.dlapiper.com>; Saulnier, Mike <michael.saulnier@us.dlapiper.com>; VandeVort, Peter <peter.vandevort@us.dlapiper.com>; Sung, Sangwon <sangwon.sung@us.dlapiper.com>; DLA-SamsungIPR-TVnGO <dla-samsungipr-tvngo@us.dlapiper.com>
Subject: Patent Owner's Request for Reply in IPR2026-00213 and IPR2026-00214

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Dear Director Squires,

Patent Owner TVnGO requests authorization to file a 3-page Reply to Petitioner's opposition to the request for discretionary denial (Paper 9) in the above-noted IPR proceedings. The requested reply would be limited to addressing legal authority cited by Petitioner in section II.A of its opposition, including intervening Director decisions issued after Patent Owner filed its request for discretionary denial, and correcting Petitioner's misrepresentations of the prosecution history in TVnGO's patents. Patent Owner proposes to limit its Reply to the following the issues:

1. The applicability of the discretionary denial decision in *Carbyne, Inc. v. Tritech Software Sys.*, IPR2025-00959, Paper 11 (Director Oct. 3, 2025) to the instant IPRs.
2. The applicability of the decisions in *Microsoft Corp. v. Sandpiper CDN, LLC*, IPR2026-00180, Paper 15 (Director, May 6, 2026) and *Magnolia Medical Tech., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 (Director May 14, 2026) (precedential), both of which issued after Patent Owner filed its request for discretionary denial.
3. Petitioner's misstatements regarding the prosecution history of TVnGO's patents, including the patents-at-issue and TVnGO's European patent application no. 05703078.5.

Patent Owner does not believe that any additional evidence or exhibits are necessary or should be permitted for the requested reply or any sur-reply.

Petitioner Samsung does not oppose this request. However, after consulting with Patent Owner concerning request #3, Petitioner believes that some additional evidence will be necessary to respond to Patent Owner's request #3 above. Petitioner therefore requests that, if authorization is granted, Petitioner be permitted to file a subsequent Sur-Reply of equal length including citation of additional evidence.

The parties are generally available for a conference call, if needed, Monday June 1 through Wednesday June 3, Friday June 5, and Monday June 8 through Friday June 12.

Respectfully submitted,

Patrick Maloney

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