

From: [Eric Zelepugas](#)
To: [Trials](#); [Bansal, Chetan R.](#); [Park, Young J.](#); [Modi, Naveen](#); [PH-Medtronic-Moskowitz-IPR](#); [Moskowitz \(Post-Grant\)](#)
Subject: Re: IPR2026-00216 & IPR2026-00217 - Patent Owner Request for Additional Word Count
Date: Monday, August 3, 2026 10:53:18 PM
Attachments: [image003.png](#)
[image004.png](#)
[image.png](#)

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Your Honors,

Thank you for your response. Patent Owner is seeking the same relief for IPR2026-00216 & IPR2026-00217 as it received in IPR2026-00162 (6,000 additional words).

Best regards,

Eric A. Zelepugas



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From: Trials <Trials@USPTO.GOV>
Sent: Monday, August 3, 2026 8:23 AM
To: Bansal, Chetan R. <chetanbansal@paulhastings.com>; Eric Zelepugas <zelepugas@avantechlaw.com>; Park, Young J. <youngpark@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; PH-Medtronic-Moskowitz-IPR <PH-Medtronic-Moskowitz-IPR@paulhastings.com>; Moskowitz (Post-Grant) <moskowitz_post-grant@avantechlaw.com>
Cc: Trials <Trials@USPTO.GOV>
Subject: RE: IPR2026-00216 & IPR2026-00217 - Patent Owner Request for Additional Word Count

Counsel for Patent Owner,

Please confirm the number of additional words you are seeking for the Patent Owner's Responses in IPR2026-00216 and IPR2026-00217. If Patent Owner is requesting 6,000 additional words as Patent Owner received in IPR2026-00162, then no conference call is needed and the Board will issue an order granting Patent Owner's request for an additional 6,000 words for the Patent Owner's Response and Petitioner's request for an additional 6,000 words for the Petitioner's Reply.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366



From: Bansal, Chetan R. <chetanbansal@paulhastings.com>
Sent: Friday, July 31, 2026 3:38 PM
To: Eric Zelepugas <zelepugas@avantechlaw.com>; Trials <Trials@USPTO.GOV>
Cc: Park, Young J. <youngpark@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; PH-Medtronic-Moskowitz-IPR <PH-Medtronic-Moskowitz-IPR@paulhastings.com>; Moskowitz (Post-Grant) <moskowitz_post-grant@avantechlaw.com>
Subject: RE: IPR2026-00216 & IPR2026-00217 - Patent Owner Request for Additional Word Count

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Your Honors,

Petitioner Medtronic does not oppose Patent Owner's request to the extent that Petitioner receives the same word count increase for the Petitioner's Reply, consistent with the Board's Order in IPR2026-00162. See Paper 22 (PTAB July 14, 2026).

If a conference call is necessary, Petitioner will make itself available.

Respectfully,

Chetan Bansal
Counsel for Medtronic

PAUL
HASTINGS

Chetan Bansal | Of Counsel, Litigation Department

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From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Wednesday, July 29, 2026 11:54 PM
To: Trials <trials@uspto.gov>
Cc: Bansal, Chetan R. <chetanbansal@paulhastings.com>; Park, Young J. <youngpark@paulhastings.com>; Modi, Naveen <naveenmodi@paulhastings.com>; PH-Medtronic-Moskowitz-IPR <PH-Medtronic-Moskowitz-IPR@paulhastings.com>; Moskowitz (Post-Grant) <moskowitz_post-grant@avantechlaw.com>
Subject: [EXT] IPR2026-00216 & IPR2026-00217 - Patent Owner Request for Additional Word Count

Honorable Board,

Patent Owner respectfully contacts the Board to request additional word count for its patent owner responses in IPR2026-00216 & IPR2026-00217. Patent Owner made a similar request in IPR2026-00162, which involves the same reference and prior art dispute based on prior conception/diligent reduction to practice evidence. The Board in that proceeding granted Patent Owner's request without motion practice. See IPR2026-00162, Paper 22 (PTAB July 14, 2026)).

Patent Owner contacted Petitioner regarding Patent Owner's request for additional word count earlier today, but Petitioner has not yet responded. To ensure Patent Owner complied with the timing in the scheduling order for the initial conference, Patent Owner opted to reach out to the Board prior to receiving Petitioner's response.

If a conference call is necessary, Patent Owner is available Friday July 31, after 1pm eastern, August 4 after 12pm eastern, and August 5 after 1pm eastern. Patent Owner will promptly update the Board with Petitioner's position and availability for a conference call upon receipt.

Please let us know whether any of those dates are convenient for the Board or whether the Board would prefer alternative dates.

Respectfully,

Eric A. Zelepugas



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