

From: [Trials](#)
To: [Baker, W. Todd](#); [Halverson, Erik J.](#); jason.engel.ptab@klgates.com; [Hill, Rebekah](#); [#Samsung-AQ](#); [Appleby, Robert A.](#); [Mizzo, F. Christopher](#); [Janes, Adam](#)
Cc: [Trials](#)
Subject: RE: Samsung Electronics v. AQ, IPR2026-00231, IPR2026-00232, and IPR2026-00234
Date: Thursday, June 4, 2026 11:38:50 AM
Attachments: [image001.png](#)

Counsel,

Petitioner is authorized to file a 5-page preliminary reply in each of IPR2026-00231, IPR2026-00232, and IPR2026-00234, due no later than June 9, 2026, limited to addressing the alleged inconsistency between Patent Owner's Preliminary Response and Exhibit 2001, and testimonial evidence by Patent Owner's expert that allegedly mischaracterizes Kang, as noted in the email below. Patent Owner is authorized to file a 5-page preliminary sur-reply in each of IPR2026-00231, IPR2026-00232, and IPR2026-00234, due no later than June 12, 2026, limited to addressing the same issues.

We remind the parties that emails to the Board should not contain arguments. The parties should file their briefs as papers in P-TACTS. The parties are not authorized to file any evidence at this time.

Regards,

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



From: Baker, W. Todd <todd.baker@kirkland.com>
Sent: Friday, May 29, 2026 2:35 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Trials <Trials@USPTO.GOV>; Halverson, Erik J. <Erik.Halverson@klgates.com>; jason.engel.ptab@klgates.com; [Hill, Rebekah <Rebekah.Hill@klgates.com>](mailto:Hill, Rebekah@klgates.com); [#Samsung-AQ](#) <Samsung-AQ@kirkland.com>; [Appleby, Robert A. <rappleby@kirkland.com>](mailto:Appleby, Robert A.@kirkland.com); [Mizzo, F. Christopher <chris.mizzo@kirkland.com>](mailto:Mizzo, F. Christopher@kirkland.com); [Janes, Adam <adam.janes@kirkland.com>](mailto:Janes, Adam@kirkland.com)

Subject: Samsung Electronics v. AQ, IPR2026-00231, IPR2026-00232, and IPR2026-00234

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,

Petitioners Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. respectfully request leave to file a reply to Patent Owners' Preliminary Responses ("POPRs") filed in IPR2026-00231, IPR2026-00232, and IPR2026-00234 in accordance with 37 C.F.R. § 42.108(c). Patent Owner has confirmed that they oppose this request. The parties' respective positions are set forth below.

Petitioners' Position:

Good cause to grant leave to file a reply exists because the POPRs present a particular characterization of the claimed subject matter, while Patent Owner introduced new evidence in support of its discretionary denial briefing (Ex. 2001, an inventor email) reflecting a materially inconsistent characterization of that subject matter. In Ex. 2001, named Inventor Choi described U.S. Pat. No. 10,547,112 (the patent resulting from the Petition's Kang application publication) as including a "[t]echnical section related to parallel structure antenna," which he highlighted. Ex. 2001 at 149, 214 (highlighting "coil antennas that are parallel connected"). Mr. Choi's statement directly conflicts with Patent Owner's argument in its POPR that Kang does not disclose the claimed parallel-connected coils. See IPR2026-00231, Paper No. 8 at 19 ('011 Patent POPR) (arguing that "*Kang* does not teach, nor is it relied upon for, inner and outer coils of an antenna pattern connected in any way. ... Instead, *Kang* describes different functional antenna patterns that, while located on a same surface and including one coil surrounding the other coils, are not electrically connected in parallel, or at all"); IPR2026-00231, Paper No. 8 at 19 ('875 Patent POPR) (same); IPR2026-00234, Paper No. 11 at 19 ('564 Patent POPR) (same); see *also* '011 Patent POPR at 23 (arguing that "*Kang* does not disclose or suggest electrically connecting an inner coil and an outer coil in parallel"); '875 Patent POPR at 23 (same); '564 Patent POPR at 23 (same).

This inconsistency bears directly on the proper understanding of the claimed subject matter and the evaluation of the Petition. Because Ex. 2001 was not part of the record at the time of the Petition, Petitioner had no opportunity to address these conflicting positions. Absent a limited reply, the Director would be presented with an internally inconsistent record regarding a central merits issue without input from Petitioner. Petitioner therefore seeks leave to file a narrowly tailored reply addressing this inconsistency and its impact on the merits analysis.

Petitioner further requests leave to respond to the testimonial evidence of Patent Owner's expert witness which also mischaracterizes the Kang reference as failing to teach the claimed parallel-connected coils. Consolidated Trial Practice Guide at 51 ("Submission of patent owner testimonial evidence at the preliminary stage may warrant granting the petitioner a reply

to such evidence. ”)

Petitioner respectfully requests a 5-page reply to address the above issues. If the request for leave to file a reply is granted, Petitioner does not oppose providing Patent Owner a sur-reply of equal length.

Patent Owner’s Position:

Petitioner’s request for a supplemental pre-institution paper should be denied for three reasons. **1)** The window has closed. Petitioner provides no explanation for why it waited a month after receiving the POPR to raise this issue. Adding a supplemental briefing schedule at this stage puts an unnecessary burden on the Director and the Board. **2)** Petitioner’s proposed “inconsistency” is not in fact inconsistent. Exhibit 2001, referring to U.S. Pat. No. 10,547,112 (the patent resulting from the Petition’s Kang application publication, Ex. 1012), simply states that Kang discloses a parallel structure across multiple layers. See Ex. 2001 at 149 (“technical section related to parallel structure antenna patent: Please refer to the yellow highlighted section on page 65 of the attached 1054712.”), 214 (“In other embodiment, two or more coils **of different layers** are connected by parallel connection to provide two more coil antennas that are parallel connected.”). This is not inconsistent with the POPR which argues that that Kang does not disclose the claimed parallel-connected coils where the inner and outer coil are **on the same surface**. See, e.g., IPR2026-00231, Paper No. 8 at 23 (’011 Patent POPR) (“Kang does not disclose an inner coil and an outer coil that make up the same antenna pattern formed **on the same surface of a substrate**, let alone that the inner and outer coil are electrically connected in parallel”); ’875 Patent POPR at 23 (same); ’564 Patent POPR at 23 (same). **3)** The Petition did not rely on the portion of Kang that Exhibit 2001 is characterizing, which appears at Ex. 1012, [0260]. The Petition set forth Petitioner’s case and it should not be afforded an opportunity to re-define the bounds of its challenge.

Patent Owner submits that no good cause has been demonstrated and no additional papers are needed at this stage in the proceeding. However, if Petitioner is afforded an additional paper, Patent Owner requests one of equal length.

Sincerely,
Todd Baker
Counsel for Petitioner

KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave., N.W., Washington, D.C. 20004
T +1 202 389 3135 **M** +1 443 622 8802
F +1 202 389 5200

todd.baker@kirkland.com

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of the multi-national law firm Kirkland & Ellis LLP and/or its affiliated entities. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return

email or by email to postmaster@kirkland.com, and destroy this communication and all copies thereof, including all attachments.