

From: [Trials](#)
To: [Anant K.](#); [PTAB Turhan Sarwar](#); [PTAB George Scott](#); [Gregory F.](#); [Rak Headwater](#); [Reza Mirzaie](#); [Marc Fenster](#); [Dale Chang](#); [Philip Wang](#); [Neil Rubin](#); jmilkey@raklaw.com
Cc: [Trials](#)
Subject: RE: IPR2026-00271 – pre-institution reply
Date: Thursday, July 16, 2026 1:30:21 PM
Attachments: [image002.png](#)
[image003.png](#)

Counsel,

Petitioner is authorized to file a 3-page preliminary reply in IPR2026-00271, due no later than July 21, 2026, limited to addressing the issues raised in Petitioner's email below. Patent Owner is authorized to file a 3-page preliminary sur-reply in IPR2026-00271, due no later than July 24, 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.

Regards,

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



From: Jim Milkey <jmilkey@raklaw.com>
Sent: Tuesday, July 14, 2026 11:59 AM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>; Trials <Trials@USPTO.GOV>
Cc: Saraswat, Anant K. <Anant.Saraswat@WolfGreenfield.com>; PTAB Turhan Sarwar <TSarwar-PTAB@wolfgreenfield.com>; PTAB George Scott <GScott-PTAB@WolfGreenfield.com>; Corbett, Gregory F. <Gregory.Corbett@WolfGreenfield.com>; Rak Headwater <rak_headwater@raklaw.com>; Reza Mirzaie <rmirzaie@raklaw.com>; Marc Fenster <mfenster@raklaw.com>; Dale Chang <dchang@raklaw.com>; Philip Wang <pwang@raklaw.com>; Neil Rubin <nrubin@raklaw.com>
Subject: Re: IPR2026-00271 – pre-institution reply

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Dear Director and Honorable Board,

Patent Owner briefly responds to Petitioner's argument for good cause, which is based on the POPR allegedly "rais[ing] a claim construction issue - whether claim 1 requires a hardware-style bus that 'by default broadcasts to all

recipients.” No good cause exists because the POPR did not make such a claim construction argument. See POPR at 12 (providing evidence that “*unless* specific, non-standard features are added to a bus, a bus will transmit data to all connected components”) (cleaned up, emphasis added); *id.*, 3–5 (noting that the claims recite functionality preventing unauthorized components from “observ[ing]” or “reading” a transmitted message); *id.*, 6, 14–17 (noting that unlike the claims, the prior art discloses no functionality restricting which components receive transmitted messages).

Respectfully submitted by counsel for Patent Owner,

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On Jul 14, 2026, at 7:01 AM, Saraswat, Anant K. <Anant.Saraswat@WolfGreenfield.com> wrote:

Dear Director and Honorable Board:

Petitioner respectfully requests authorization to file a 4-page reply to the POPR in IPR2026-00271. The POPR states that “a ‘bus’ by default broadcasts to all recipients” (POPR at p. 3), cites to a definition of a hardware bus (EX-2008, cited at POPR at p. 12-13), and argues that the Petition’s prior art “does not disclose or render obvious disallowing any other components resident on that device from accessing the message once it is placed on the bus.” POPR at p. 16; *see also id.* at 12, 14, 18 n.1 (“...the Petition describes no mechanism in its combination for disallowing unidentified software components from accessing the bus while a message is being transmitted.”). The POPR’s argument raises a claim construction issue – whether claim 1 requires a hardware-style bus that “by default broadcasts to all recipients,” and further requires “disallowing” some recipients “from accessing the message once it is placed on the bus.” Good cause exists to reply to the POPR to address this issue, which was not foreseeable, at least because claim 1 recites an “an inter-process software communication bus,” and because the Petition does not rely on a hardware-style bus that “by default broadcasts to all recipients.” Petitioner does not oppose Patent Owner being granted a 4-page surreply if Petitioner is granted a 4-page reply.

Petitioner understands that Patent Owner opposes this request and that Patent Owner may elect to present argument by email.

Should a conference call be deemed necessary, counsel for the parties are available at the following times:

- Wednesday, July 15 after 3 PM Eastern
- Friday, July 17 after 12 Eastern

Respectfully submitted,

By counsel for Petitioner,



Anant Saraswat

He/Him/His

Shareholder

Admitted to Practice: MA; U.S. Patent Office

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