

From: [Director_PTABDecision_Review](#)
To: [Modi, Naveen](#); [Wayne Helge](#); [Carma v. Uber](#); [PH-Uber-Carma-IPR](#); [James Wilson](#)
Subject: RE: IPR2026-00306, -00307, -00308, -00309 | Request for Extension of Director Review Deadline - Granted
Date: Tuesday, September 1, 2026 4:31:00 PM
Attachments: [image001.png](#)

Counsel,

Petitioner's request for extension of time to request Director Review of the decision denying institution in the above identified proceedings is granted. Petitioner may file its requests for Director Review along with relevant filings from the district court no later than September 11, 2026.

Thank you.

IPR2026-00306, 00307, 00308, 00309
Ex. 3001

From: Modi, Naveen <naveenmodi@paulhastings.com>
Sent: Tuesday, September 1, 2026 1:08 PM
To: Wayne Helge <whelge@bdiplaw.com>; Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Carma v. Uber <BDIP-Carma_Uber@bdiplaw.com>; PH-Uber-Carma-IPR <PH-Uber-Carma-IPR@paulhastings.com>; James Wilson <jwilson@bdiplaw.com>
Subject: RE: IPR2026-00306, -00307, -00308, -00309 | Request for Extension of Director Review Deadline

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Dear Director Squires,

Petitioners respectfully request leave to provide a brief response to Patent Owner's opposition, limited to (i) Patent Owner's interpretation of "trial has not progressed meaningfully" in *Light & Wonder, Inc.*, and (ii) the procedural significance of the August 27, 2026 Report and Recommendation, or, in the alternative, an opportunity to address these issues in the Director Review requests themselves, should the extension be granted.

Respectfully,
Naveen

Naveen Modi
Global Co-Chair of IP & Partner
Paul Hastings LLP
(202) 551-1990

From: Wayne Helge <whelge@bdiplaw.com>

Sent: Monday, August 31, 2026 2:37 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Cc: Modi, Naveen <naveenmodi@paulhastings.com>; Carma v. Uber <BDIP-Carma_Uber@bdiplaw.com>; PH-Uber-Carma-IPR <PH-Uber-Carma-IPR@paulhastings.com>; James Wilson <jwilson@bdiplaw.com>

Subject: [EXT] RE: IPR2026-00306, -00307, -00308, -00309 | Request for Extension of Director Review Deadline

Dear Director Squires,

Patent Owner objects to Petitioner's request. Under *Light & Wonder*, "in exceptional circumstances, the Office may extend the deadline for filing a request for Director Review of a decision on institution, so long as the trial has not progressed meaningfully."

Here, the district court litigation has already progressed far beyond a point of making meaningful progress towards trial, with a claim construction order issued and dispositive and expert motions fully briefed as of August 10. Given that meaningful progress has already been surpassed, the "exceptional circumstances" of *Light & Wonder* should not be examined.

Even if the trial scheduled had not already progressed meaningfully, the "exceptional circumstances" of *Light & Wonder* do not apply here because there has been no action in the district court that "eliminates any parallel litigation as to the four patents challenged." As Petitioner is aware, the magistrate's opinion that issued on August 27 is only a Report and Recommendation ("R&R"), and briefing regarding Patent Owner's objections to the R&R under FRCP 72(b)(2) will last at least 28 days. Then, pursuant to FRCP 72(b)(3), "[t]he district judge must determine de novo any part of the magistrate judge's disposition that has been properly objected to. The district judge may accept, reject, or modify the recommended disposition; receive further evidence; or return the matter to the magistrate judge with instructions." Thus, even as of September 11, the District Court will not have entered any order in favor of either party on the R&R, and no "exceptional circumstances" exist.

As such, Patent Owner respectfully submits that the status quo should be maintained in these four denied IPR proceedings, with Petitioner's extension request denied.

Counsel for Petitioner is copied on this email.

Respectfully,

Wayne Helge
Lead Counsel for Patent Owner



Wayne M. Helge

Partner

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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Friday, August 28, 2026 1:58 PM
To: Modi, Naveen <naveenmodi@paulhastings.com>; Carma v. Uber <BDIP-Carma_Uber@bdiplaw.com>; PH-Uber-Carma-IPR <PH-Uber-Carma-IPR@paulhastings.com>
Subject: RE: IPR2026-00306, -00307, -00308, -00309 | Request for Extension of Director Review Deadline

[EXTERNAL]

Counsel,

Patent Owner may respond with its position as to Petitioner's request via email by Monday, August 31st.

Thank you.

From: Modi, Naveen <naveenmodi@paulhastings.com>
Sent: Friday, August 28, 2026 4:32 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Carma v. Uber <bdip-carma_uber@bdiplaw.com>; PH-Uber-Carma-IPR <PH-Uber-Carma-IPR@paulhastings.com>
Subject: IPR2026-00306, -00307, -00308, -00309 | Request for Extension of Director Review Deadline

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Dear Director Squires,

Pursuant to 37 C.F.R. § 42.75(c)(1) and the procedure set forth in *Light & Wonder, Inc. v. Evolution Malta Limited*, IPR2025-01072, Paper 30 (Director June 22, 2026), Petitioners Uber Technologies, Inc. and Uber Freight US LLC respectfully request an extension of the deadline to file a request for Director Review of the July 14, 2026, decisions denying institution in the above-referenced proceedings based on exceptional circumstances. As directed in *Light & Wonder*, the following three sentences summarize why exceptional circumstances warrant an extension of the deadline:

On August 27, 2026—after expiration of the deadline to request Director Review of the July 14, 2026 decisions denying institution in IPR2026-00306, IPR2026-00307, IPR2026-00308, and IPR2026-00309—the Magistrate Judge in the parallel Eastern District of Texas litigation issued a Report and Recommendation recommending dismissal of two of the three defendants (Uber Technologies, Inc. and Uber Freight Holding Corporation) for improper venue. This development, which could not have been raised before the Director Review deadline expired, eliminates any parallel litigation as to the four patents challenged in IPR2026-00306 through -00309. Accordingly, these cases present exceptional circumstances warranting an extension of the Director Review deadline because (i) the elimination of the parallel litigation as to the challenged patents is analogous to the “dismissal of all or substantially all claims in a co-pending litigation” identified in *Light & Wonder* as an exceptional circumstance, (ii) these petitions presented evidence of material Office error (the failure to consider the Olmi prior art reference during prosecution), (iii) no preliminary patent owner response was filed, and (iv) Petitioners are filing this request one day after the Report and Recommendation issued.

Additionally, pursuant to the Director's September 16, 2025, Memorandum regarding PTAB consideration of prior findings of fact and conclusions of law, Petitioners request authorization to file the Report and Recommendation issued on August 27, 2026, as well as the district court's Claim Construction Order.

Accordingly, Petitioners respectfully propose a deadline of September 11, 2026, to file their requests for Director Review.

Counsel for Patent Owner is copied on this email.

Respectfully,
Naveen

Naveen Modi
Global Co-Chair of IP & Partner
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