

From: [Modi, Naveen](#)
To: [Director PTABDecision_Review](#); [Citroen, Phillip W.](#); [Wayne Helge](#); [Carma v. Uber](#); [PH-Uber-Carma-IPR](#); [James Wilson](#)
Subject: IPR2026-00306, -00307, -00308, -00309 - Director Review Requests
Date: Monday, September 28, 2026 2:17:47 PM

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Dear Director Squires,

IPR2026-00306, 00307, 00308, 00309
Ex. 3102

We write to inform you of two developments impacting the above-referenced IPR proceedings.

First, on September 25, 2026, Judge Gilstrap issued an order in the parallel E.D. Texas action adopting the magistrate judge's Report and Recommendation dismissing Uber Freight Holding Corporation and Uber Technologies, Inc. from that case. See *Carma Tech., Corp. v. Uber Tech., Inc.*, Civ. No. 2:25-cv-29, D.I. 358.

Second, on September 25, 2026, Carma filed a new complaint in the District of Delaware asserting the patents challenged in the above-referenced IPR proceedings against Uber Technologies, Inc. See *Carma Tech., Corp. v. Uber Tech., Inc.* (D. Del. Sept. 25, 2026).

If the Director would like a copy of the E.D. Texas order and/or the Delaware complaint, Petitioners are prepared to submit them.

Petitioners contacted Patent Owner on September 25 regarding jointly informing the Director of Judge Gilstrap's order, and again on September 27 regarding jointly informing the Director of both that order and the new Delaware complaint. Patent Owner stated that it needed additional time to consider the proposed communication. Given the relevance of these developments to the Director's review of Petitioners' requests, Petitioners are providing this factual update now.

Respectfully,
Naveen Modi

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

From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Wednesday, September 23, 2026 5:11 PM
To: Modi, Naveen <naveenmodi@paulhastings.com>; Citroen, Phillip W. <phillipcitroen@paulhastings.com>; Wayne Helge <whelge@bdiplaw.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 Petitioner's request for reply to Director Review Request - Denied

Counsel,

Petitioner's request for authorization to file a reply in support of its request for Director Review is denied at this time.

Thanks.

From: Modi, Naveen <naveenmodi@paulhastings.com>

Sent: Wednesday, September 23, 2026 2:14 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Citroen, Phillip W. <phillipcitroen@paulhastings.com>; Wayne Helge <whelge@bdiplaw.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: RE: IPR2026-00306, -00307, -00308, -00309 Director Review Request

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 respectfully request authorization to submit a three-page paper to correct a factual mischaracterization in Patent Owner's oppositions to Petitioners' Director Review requests in the above-referenced proceedings. Patent Owner asserts, for the first time and based on the unauthorized, selective introduction of new evidence, that Petitioners pursued different claim constructions before the District Court and the PTAB. Petitioners request a short paper to show that Patent Owner's representation is factually incorrect and that Petitioners have pursued and continue to pursue the same constructions in both forums. *Compare* IPR2026-00306, Paper 1 at 5-7 with IPR2026-00306, Ex. 1045. The proposed paper would address this issue based on the existing record, but to ensure a complete record, Petitioner also seeks authorization to submit Patent Owner's recently filed objections to the claim construction order, which Patent Owner omitted from its oppositions.

Petitioners would be prepared to file the paper within two business days of authorization.

Prior to sending this email, Petitioners reached out to Patent Owner for its position. Patent Owner indicated that it objects to Petitioner's request because PO's statement in opposition was correct. Petitioner is now advocating that the Board apply broader construction in the IPRs, and Petitioner's Request newly applied the Olmi reference to the district court's adopted constructions. See, e.g., IPR2026-00306, Paper 10 at 4-6. These constructions are broader than and conflict with the narrow

constructions Petitioner continues to advocate in the district court, including via its recently-filed objections to the claim construction order (Ex. 2006). To the extent Petitioner is allowed a three-page reply to address claim construction positions, Patent Owner also requests a three-page sur-reply to address the same topic.

Respectfully,
Naveen Modi

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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Monday, September 14, 2026 11:31 AM
To: Modi, Naveen <naveenmodi@paulhastings.com>; Wayne Helge <whelge@bdiplaw.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 Director Review Request

Counsel,

Petitioner's request for Director Review has been received in the above-referenced case. Patent Owner is authorized to submit a response limited to the issues raised in the Director Review request, of no more than 15 pages, to be filed within five business days of this email. Any such response must be filed in P-TACTS, i.e., by selecting the "Other: Other" paper type and the paper must be titled "Authorized Response to Director Review Request" or it may not be considered. No new evidence is permitted. No further briefing is authorized at this time.

The Director will determine whether review will be granted or denied and the parties will be notified of the result of the Director Review request.

Thank you.

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