

From: [Director Discretionary Decision](#)
To: [Colette Woo](#); [Director Discretionary Decision](#)
Cc: [Nathan Lowenstein](#); [Kenneth Weatherwax](#); [Dennis Courtney](#); [Qomplx IPRs@lowensteinweatherwax.com](#); [James M. Glass](#); [Quincy Lu](#); [Brian Biddinger](#); [Jeremy Thomas](#); [qe-pan-qomplx-ipr@quinnemanuel.com](#)
Subject: RE: IPR2026-00371 - Request for Authorization to File Reply
Date: Tuesday, September 8, 2026 9:43:43 AM

Patent Owner is authorized to file a 2-page reply in IPR2026-00371, due no later than Thursday, September 10, 2026, limited to addressing the matters raised below. Petitioner is authorized to file a 2-page sur-reply, due no later than Tuesday, September 15, 2026.

From: Colette Woo <woo@lowensteinweatherwax.com>
Sent: Friday, September 4, 2026 2:31 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Nathan Lowenstein <lowenstein@lowensteinweatherwax.com>; Kenneth Weatherwax <weatherwax@lowensteinweatherwax.com>; Dennis Courtney <Courtney@lowensteinweatherwax.com>; Qomplx_IPRs@lowensteinweatherwax.com; James M. Glass <jimglass@quinnemanuel.com>; Quincy Lu <quincylu@quinnemanuel.com>; Brian Biddinger <brianbiddinger@quinnemanuel.com>; Jeremy Thomas <jeremythomas@quinnemanuel.com>; qe-pan-qomplx-ipr@quinnemanuel.com
Subject: IPR2026-00371 - Request for Authorization to File Reply

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Honorable Director,

Patent Owner Qomplx LLC respectfully requests authorization to file a 2-page reply to Petitioner's Opposition to Patent Owner's Request for Discretionary Denial of Institution in the above-referenced case. Patent Owner can file its reply within two business days of authorization being granted.

The reply will address the issue of Petitioner's inconsistent claim construction positions. Good cause exists because Petitioner served its amended invalidity contentions the day before it filed its Opposition, and thus, Patent Owner could not address them beforehand.

Counsel for Patent Owner has met and conferred with counsel for Petitioner, and Petitioner states: Petitioner opposes Patent Owner's request for additional briefing, as Patent Owner has failed to establish good cause and because the request does not provide for a surreply.

Petitioner would not oppose the request if the Director granted a surreply of equal length and timing (Petitioner offered this compromise to Patent Owner; Patent Owner opposes).

Petitioner will not address the merits of Patent Owner's arguments unless and until authorized

by the Director.

If the Director deems a call necessary, the parties are available at the Deputy Director's convenience.

Best,

Colette Woo | **Lowenstein & Weatherwax LLP**
1016 Pico Blvd, Santa Monica, CA 90405
Office: 310.307.4500