

From: [Director_PTABDecision_Review](#)
To: [Stach, Jason](#); [Price, Jeffrey H.](#); [McCammon, Luke](#); [Sahlsten, Sonja](#); [High, Robert](#); [Gomaco-IPRs](#); [Hannah, James](#); [Fuller, Jenna](#)
Subject: RE: PGR2024-00026 - Request for Authorization to File Reply
Date: Wednesday, December 31, 2025 1:37:00 PM

Counsel,

Patent Owner's request for authorization to file a reply brief in support of its request for Director Review in the above identified proceeding is denied.

Thank you.

From: Stach, Jason <Jason.Stach@finnegan.com>
Sent: Wednesday, December 31, 2025 9:54 AM
To: Price, Jeffrey H. <jeffrey.price@hsfkramer.com>; Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: McCammon, Luke <Luke.McCammon@finnegan.com>; Sahlsten, Sonja <Sonja.Sahlsten@finnegan.com>; High, Robert <Robert.High@finnegan.com>; Gomaco-IPRs <Gomaco-IPRs@finnegan.com>; Hannah, James <james.hannah@hsfkramer.com>; Fuller, Jenna <jenna.fuller@hsfkramer.com>
Subject: RE: PGR2024-00026 - Request for Authorization to File Reply

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Dear Director Squires,

Gomaco disagrees with G&Z's characterization of the issues and believes that a reply is not warranted. Gomaco also believes that G&Z's lengthy argument in its request for authorization is not appropriate. Gomaco refrains from presenting an extended argument here, but if the Director authorizes G&Z to file a reply, Gomaco requests authorization to file an equal-length sur-reply.

Respectfully submitted,

Jason Stach
Counsel for Gomaco

From: Price, Jeffrey H. <jeffrey.price@hsfkramer.com>
Sent: Tuesday, December 30, 2025 11:32 PM
To: [Director_PTABDecision_Review@uspto.gov](#)
Cc: Stach, Jason <[Jason.Stach@finnegan.com](#)>; McCammon, Luke

PGR2024-00026
Ex. 3101

<Luke.McCammon@finnegan.com>; Sahlsten, Sonja <Sonja.Sahlsten@finnegan.com>; High, Robert <Robert.High@finnegan.com>; Gomaco-IPRs <Gomaco-IPRs@finnegan.com>; Hannah, James <james.hannah@hsfkramer.com>; Fuller, Jenna <jenna.fuller@hsfkramer.com>

Subject: PGR2024-00026 - Request for Authorization to File Reply

Dear Director Squires,

Patent Owner, G&Z, respectfully requests authorization to file a 4-page Reply to address new arguments and material mischaracterizations in Petitioner's Authorized Response to Director Review Request in PGR2024-00026, and to file its Reply within three (3) business days of authorization (or on such schedule as the Director Review Team prefers). Good cause exists for this Reply:

1. G&Z requests authorization to address Gomaco's allegation that it has committed an "abuse of the Director Review Process" by attempting to correct a plain, dispositive error in the Board's analysis of the AIA-eligibility issue. Response at 3. In connection with this request, G&Z intends to address Gomaco's false statements and mischaracterizations concerning the Board's Final Written Decision and the Decision Denying institution in IPR2021-00135. Response at 7.
2. Gomaco states that the Board did not grant collateral estoppel to the decision in IPR2021-00136 despite giving it preclusive effect and without reexamining the record evidence. Response at 8-9. G&Z requests authorization to address the implications of Gomaco's reading of the Final Written Decision and its false statement that it raised the issue of the priority date for Claim 8 of the '571 Patent in the Petition.
3. Gomaco presents several new arguments and cites new legal authority intended to support a legal theory not adopted by the Board in its Final Written Decision and contrary black letter law. Response at 3-5. To the extent that the Director intends to consider these new arguments, G&Z requests the opportunity to address them.

Aside from these limited issues, G&Z believes that the record is clear and thanks the Director for his consideration of the case.

Kind regards,

Jeffrey Price (Reg. No. 69,141)

Counsel for Patent Owner, Guntert & Zimmerman

Jeffrey H. Price
Special Counsel

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