

From: [Director Discretionary Decision](#)
To: [Argenti, Matthew](#); [Director Discretionary Decision](#)
Cc: [Waidelich, Sarah E.](#); [Barnett, Scott D.](#); [Thomas, David J.](#); [Saunders, Jenna E.](#); [Rosato, Michael](#); [Mills, Jad](#); [Thomas, Tasha](#)
Subject: RE: PGR2025-00027, PGR2025-00028
Date: Thursday, May 29, 2025 9:32:32 AM

Patent Owner is authorized to file a 5-page Reply in PGR2025-00027 and PGR2025-00028, due no later than Monday, June 2, 2025, limited to addressing Petitioner's reliance on the precedential decision in *Ecto World*.

From: Argenti, Matthew <margenti@wsgr.com>
Sent: Wednesday, May 28, 2025 3:48 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Waidelich, Sarah E. <swaidelich@honigman.com>; Barnett, Scott D. <sbarnett@honigman.com>; Thomas, David J. <dthomas@honigman.com>; Saunders, Jenna E. <jsaunders@honigman.com>; Rosato, Michael <mrosato@wsgr.com>; Mills, Jad <jmills@wsgr.com>; Thomas, Tasha <tthomas@wsgr.com>
Subject: PGR2025-00027, PGR2025-00028

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Dear Honorable Director,

Patent Owner PayRange requests authorization to file five-page replies to Petitioner's opposition to Patent Owner's request for discretionary denial in each of PGR2025-00027 and -00028 (Paper 8 in each, filed May 23, 2025). The replies will address arguments and issues raised in the opposition, including Petitioner's reliance on the PTAB's *Ecto World* decision. Good cause exists for a reply because *Ecto World* issued on May 19, 2025 and therefore neither that case nor Petitioner's arguments could have been addressed in our requests for discretionary denial.

Petitioner does not oppose Patent Owner's request and provides the following statement of its position:

Although we do not believe a reply is warranted, Petitioner will not oppose Patent Owner's request for a five-page discretionary denial reply in each of the referenced PGR proceedings, limited to addressing the *Ecto World* decision and arguments relating thereto. Petitioner also maintains that the replies should be filed on an expedited basis, by no later than June 2, 2025. Finally, Petitioner reserves the right to seek authorization to file a sur-reply.

Respectfully,

Matthew A. Argenti
Counsel for Patent Owner PayRange LLC

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