

**From:** [John Edmonds](#)  
**To:** [Trials](#)  
**Cc:** [TVPPTABDocket](#); [Pearce Jr., T. Vann](#); [PTO-Edmonds](#); [Jesse Villegas](#)  
**Subject:** RE: IPR2019-00131: Request for Authorization to File Reply to Patent Owner's Preliminary Response  
**Date:** Thursday, February 14, 2019 2:43:06 PM  
**Attachments:** [image005.png](#)

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Dear Board,

Respondent opposes Petitioner's request and does not deem a call necessary, but – should the Board desire a call - within the below parameters, our availability is as follows:

after 2 PM Eastern tomorrow (Friday, February 15);  
next Wednesday afternoon after 2 pm Eastern (February 20); or  
any time on Friday of next week (February 22).

Respectfully,

John Edmonds

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**From:** Pearce Jr., T. Vann <[vpearce@orrick.com](mailto:vpearce@orrick.com)>  
**Sent:** Thursday, February 14, 2019 12:32 PM  
**To:** [Trials@USPTO.gov](mailto:Trials@USPTO.gov)  
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**Subject:** IPR2019-00131: Request for Authorization to File Reply to Patent Owner's Preliminary Response

Dear Board,

Petitioners request a conference call with the Board seeking authorization to file a reply brief to the Patent Owner's Preliminary Response ("POPR") in IPR2019-00131. The reply would be limited to addressing the lack of standing argument in the POPR. Specifically, the reply would address Patent Owner's argument, citing case law involving cancelled claims or claims ruled invalid following all appeals, that Petitioners "fail to show sufficient grounds or standing for institution" because of a district court ruling of invalidity under Section 101 that Patent Owner is appealing to the Federal Circuit (POPR, page 42).

The parties have met and conferred. Patent Owner stated that it opposes Petitioners'

request and that Patent Owner is available for a conference call after 2 PM Eastern tomorrow (Friday, February 15). Petitioners are available during that time as well; Petitioners also are available next Wednesday afternoon (February 20) or any time Thursday or Friday of next week (February 21-22).

Respectfully submitted,  
Vann Pearce  
Lead Counsel for Petitioners

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