

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERIDIAN WILDLIFE SERVICES, LLC,
Petitioner,

v.

SAFE HAVEN WILDLIFE REMOVAL AND PROPERTY
MANAGEMENT EXPERTS, LLC,
Patent Owner.

IPR2022-01254
Patent 10,729,108 B2

Before NEIL T. POWELL, MICHAEL L. WOODS, and AMEE A. SHAH,
Administrative Patent Judges.

SHAH, *Administrative Patent Judge.*

DECISION
Denying Petitioner's Request on Rehearing of
Decision Denying Institution
37 C.F.R. § 42.71(d)

I. INTRODUCTION

A. BACKGROUND

Petitioner, Meridian Wildlife Services, LLC, filed a Petition for *inter partes* review of claims 1–17 (the “Challenged Claims”) of U.S. Patent No. 10,729,108 B2 (Ex. 1002, “the ’108 patent”). Paper 1 (“Pet.”). Patent Owner, Safe Haven Wildlife Removal and Property Management Experts LLC, filed a Preliminary Response. Paper 8 (“Prelim. Resp.”). Pursuant to our authorization, Petitioner filed a Reply to Patent Owner’s Preliminary Response (Paper 9 (“Reply”)) and Patent Owner filed a Sur-reply (Paper 10 (“Sur-reply”)).

In our decision on institution (Paper 11, “Dec.” or “Decision”), we determined that Petitioner failed to show a reasonable likelihood of prevailing with respect to any of the Challenged Claims and denied institution of *inter partes* review.

Petitioner filed a timely Request for Rehearing in which it asks that we institute *inter partes* review of the Challenged Claims. Paper 12, 1 (“Reh’g Req.” or “Request”).

For the reasons that follow, we *deny* Petitioner’s Request.

B. ASSERTED GROUNDS OF UNPATENTABILITY

Petitioner asserts that the Challenged Claims are unpatentable based on the following grounds (Pet. 12):

Claims Challenged	35 U.S.C. §	Reference(s)
1–17	103	Brugh ¹
1–17	103	Brugh, Kunz ²
1–17	103	Bird Barrier Video, ³ Kunz

In support of its unpatentability contentions, Petitioner also relies on the Declaration of Michael J. Chamberlain (Ex. 1004). *See, e.g.*, Pet. 6 (“As confirmed by Petitioner’s expert, Dr. Chamberlain . . .”).

C. STANDARD FOR REHEARING

The party filing a request for rehearing of a decision whether to institute has the burden of showing the decision should be modified, and the request for rehearing must specifically identify all matters the party believes the Board misapprehended or overlooked and the place where each matter was previously addressed in its papers. 37 C.F.R. § 42.71(d). “When rehearing a decision on petition, a panel will review the decision for an abuse of discretion.” *Id.* § 42.71(c)).

¹ Brugh, U.S. Patent Application Publication No. 2017/0238524 A1, published Aug. 24, 2017 (Ex. 1008, “Brugh”), issued as U.S. Patent No. 9,943,073 B2 on Apr. 17, 2018.

² ECOLOGICAL AND BEHAVIORAL METHOD FOR THE STUDY OF BATS (Thomas H. Kunz, 1998). Ex. 1010.

³ Bird Barrier, *Mist Kit Assembly and Use*, YouTube (Aug. 19, 2014). Ex. 1009 (“Bird Barrier Video”).

II. ANALYSIS

In its Request, Petitioner argues that the Board misapprehended Petitioner’s arguments and evidence under Grounds A (Brugh) and B (Brugh and Kunz). *See* Reh’g Req. 2–15.

We address each of Petitioner’s arguments separately, below.

A. GROUND A – CLAIMS 1–17 AS UNPATENTABLE OVER BRUGH

Petitioner presents four separate sub-arguments under its general argument that “**[t]he Board misapprehended Petitioner’s arguments and evidence under Ground A.**” *See* Reh’g Req. 1–14. We address each of those sub-arguments separately, below.

1. “**The Board misapprehended the argument that it would have been obvious to place at least one of Brugh’s nets proximate to a perimeter wall (and additional areas) ‘in response to observing flight patterns in those locations,’ overlooked testimony confirming that a [person having ordinary skill in the art (‘POSA’)] would observe birds flying proximate to a perimeter wall, and misapplied the law of obviousness.**” Reh’g Req. 2.

Within this sub-argument, Petitioner argues that the “Board misapprehended Petitioner’s argument in several ways.” Reh’g Req. 2. We address each “way” in turn below.

a) “[I]t was self-evident that a POSA following Brugh’s teaching would eventually observe birds or other flying vertebrates flying along a perimeter wall (and in other locations) within a building and then place Brugh’s devices in those locations. . . .” Reh’g Req. 2–3.

First, Petitioner contends that

Given the breadth of the ’108 Patent’s claims—which cover methods and systems for relocation birds of *any number and any*

species within a structure of *any size, shape, or configuration*—it was self-evident that a POSA following Brugh’s teaching would eventually observe birds or other flying vertebrates flying along a perimeter wall (and in other locations) within a building and then place Brugh’s capture device in those locations.

Reh’g Req. 2–3 (citing Pet. 18). In support of this contention, Petitioner makes several sub-arguments, that we address in turn below.

Petitioner first argues that “[t]he Board misinterpreted Petitioner’s argument as ‘premised’ on the fact that a POSA would have ‘expected’ a flying vertebrate to fly along the perimeter of a structure” and “conflated two of Petitioner’s arguments.” *Id.* at 4. Petitioner asserts that it presented that “either scenario—a POSA *actually observing* birds flying near a perimeter wall or a POSA’s *expectation* of where birds in a building would fly—would have motivated a POSA to position Brugh’s net proximate to a perimeter wall.” *Id.* (citing Pet. 16, 18; Ex. 1004 ¶ 69). We disagree.

The Petition provided three reasons why a POSA would have found it obvious to place at least one of Brugh’s capture devices along a perimeter wall and in another location: “

First, given Brugh’s teaching that a flying vertebrate’s ‘flight pattern’ should be used to place nets, a POSA would have found it obvious to place at least one of Brugh’s capture devices along a perimeter wall and at least one of Brugh’s capture devices in another location within a building in response to observing flight patterns in those locations. Indeed, as bats and other flying animals *tend to roost in locations* that are protected from frequent disturbance, a POSA would have been motivated to place Brugh’s capture device (a trapping net) along the perimeter of a structure based on the expected *location* of the flying animal. *Second*, a POSA would have understood that placing Brugh’s capture device proximal to a flying vertebrate—with at least one capture device along a perimeter wall and at least one capture device in another location—would effectively

shrink the area in which the vertebrate is able to fly and thereby improve the likelihood of capture. . . . *Third*, a POSA would know that increased net density would result in increased capture rate.”

Pet. 18 (citing Ex. 1008 ¶¶ 15, 45; Ex. 1004 ¶¶ 32, 33, 74, 75) (emphases added).

The first reason was not written as observing flight patterns or, alternatively, *expecting* flight patterns, but as one reason resulting from “observing flight patterns,” premised on the tendency of birds to roost in a protected, expected *location*, such as, ostensibly, along the inside perimeter wall of a building. The second reason was that the placement of the nets *along* a perimeter wall and in another location would shrink the bird’s flying area and thus improve capture. The third reason was, ostensibly, that having more nets, i.e., increased net density, would increase the capture rate. The Decision addressed the first argument regarding observing flight patterns at pages 36–37, the second argument at pages 37–38, and the third argument at pages 38–39.

In its second sub-argument on rehearing in this section, Petitioner contends that it provided evidence to support a finding that a flying animal would fly along the perimeter wall in explaining that Brugh establishes that there was a known increase in flying vertebrates finding their way inside buildings and that Brugh instructs a POSA to observe their flight patterns and to place the nets wherever the vertebrates are flying; thus, “it was necessarily obvious to place Brugh’s capture nets *anywhere* birds . . . fly inside a building.” Reh’g Req. 4 (citing Pet. 17–18; Ex. 1008 ¶¶ 5, 15, 45; Ex. 1004 ¶¶ 32, 72, 75). In support of this argument, Petitioner cites to the

testimony of the inventor of the '108 patent, Mr. Tolley. *See id.* at 4–5 (citing Ex. 2001 ¶¶ 16, 17). We disagree.

Petitioner's argument does not give enough credit to the inventor's discovery. Mr. Tolley, the inventor, testified that he “spent countless hours monitoring bird flights and patterns within Walmart's facilities and other indoor structures, focusing not only on where birds typically roosted in the facilities, but also where and how they flew within the enclosures . . . and experimenting with various placements of nets based on [his] observations.” Ex. 2001 ¶ 16. We do not find Petitioner's citation to the inventor's testimony, in which the inventor testifies to having “spent countless hours” working on his discovery, to support Petitioner's argument that the inventor's discovery would have been obvious based on Brugh's “instruct[ions to] a POSA to observe the ‘flight patterns’ of these birds” and to “place nets where the birds are observed flying in the building.” Reh'g Req. 4 (citing Ex. 1008 ¶¶ 15, 45; Ex. 1004 ¶¶ 32, 72, 75). Brugh does not “instruct” a POSA to perform either of these actions. Rather, Brugh provides a method comprising, in relevant part, “a) determining the species of flying vertebrate inside the building; b) selecting bird netting; . . . [and] d) positioning the netting for capture based on the species of flying vertebrate and their flight characteristics utilizing the *height adjustable poles to raise the netting*.” Ex. 1004 ¶¶ 8–10, 15 (emphasis added). There is no “instruction” that the *location* of the netting is adjusted based on the flight pattern; rather, the *height* is adjusted. Brugh further provides for “determin[ing] how [the flying vertebrate] flies, e.g., a bat flies in a different pattern than a sparrow” and using the flight pattern “to place the netting in relationship to the position of the flying vertebrate.” *Id.* ¶ 45. There is no

“instruction” that the determining of the flight pattern must be by *observing* the flying vertebrate (as opposed to researching the flight pattern of the species of the flying vertebrate) or that the netting is placed in relationship to an *observed* or *expected* position.

b) “*The Board’s analysis ignores common sense.*”
Reh’g Req. 5.

Petitioner contends that the Board ignored common sense, as “at some point a POSA necessarily would have observed some species of flying animal near some perimeter walls within some building.” *Reh’g Req. 5*; *see also id.* at 5–6 (“Accounting for common sense in the obviousness inquiry is of particular importance when—as is the case here—‘the limitation in question [is] unusually simple and the technology particularly straightforward.’ . . . [T]he Board . . . substitutes a rigid review of the prior art’s disclosure for common sense. . . .”) (citations omitted)). This argument is unavailing.

“[W]hile ‘common sense’ can be invoked, even potentially to supply a limitation missing from the prior art, it must still be supported by evidence and a reasoned explanation.” *Arendi S.A.R.L. v. Apple Inc.*, 832 F.3d 1355, 1363 (Fed. Cir. 2016).

As explained above, Petitioner’s argument discounts the inventor’s discovery, in which he spent “countless hours” before discovering that birds fly along the perimeter wall of a building’s interior. Ex. 2001 ¶ 16. Further, as discussed above, Brugh does not instruct nor teach a POSA to observe flight patterns and determine or adjust the *locations* of the nets accordingly. We are not persuaded that the inventor’s discovery was merely “common sense,” and if it was, Petitioner should have submitted sufficient evidence to

support such a finding. *See Arendi*, 832 F.3d at 1363. As explained in our Decision, Petitioner did not. *See, e.g.*, Dec. 37 (“Petitioner provides insufficient evidence that bats or other flying animals are likely to fly or roost along the ‘outer edge of a structure’ such that a POSA would find it obvious to place a net along the perimeter of a wall within a building”). A request for rehearing under 37 C.F.R. § 42.71(d) is not an opportunity for Petitioner to simply *reargue* issues we previously addressed.

For the foregoing reasons, Petitioner does not show that the Board overlooked or misapprehended any arguments under this subheading (II)(A)(1). *See* 37 C.F.R. § 42.71(d).

2. “The Board misapprehended evidence in support for Petitioner’s argument that a POSA, even without observing flight patterns, would have *expected* flying vertebrates to fly proximate to a perimeter wall.” Reh’g Req. 7.

Petitioner contends that because flying animals tend to *roost* in locations protected from frequent disturbance, Petitioner was arguing that “a POSA—even without actually observing birds in a building—would nonetheless have ‘expected’ birds to pursue flight patterns near a perimeter wall and would have placed at least one of Brugh’s nets in that location.” Reh’g Reg. 7 (citing Pet. 18; Ex. 1004 ¶¶ 32, 33, 75).

If Petitioner understood the roosting location to mean or indicate expected flight patterns, then Petitioner should have presented that argument in the Petition. Petitioner did not. Rather, as discussed above, the assertion that animals tend to roost in protected locations was in support of Petitioner’s first reason that given Brugh’s teaching of using a flight pattern to “place nets,” a POSA would have found it obvious to place the nets along

a perimeter wall and in another location in response to observing flight patterns (Pet. 18).

Petitioner also argues that the Board’s determination that “Petitioner provides insufficient evidence that bats or other flying animals *are likely to* fly or roost along the ‘outer edge of a structure’ such that a POSA would find it obvious to place a net along the perimeter of a wall within a building” (Reh’g Req. 7 (quoting Dec. 37 with added emphasis)) “misapprehends the testimony of Petitioner’s expert (Dr. Chamberlain) and the evidence cited in support of his declaration” (*id.*). Petitioner argues that the Board erred in disregarding Dr. Chamberlain’s testimony. *Id.* at 8–9. We disagree.

As explained in our Decision, “Petitioner’s reason that it would have been obvious to place at least one net ‘along a perimeter wall . . . *in response to observing flight patterns in those locations*’ is premised on the alleged fact” that bats and other animals tend to roost in protected locations. Dec. 36 (citing Pet. 18). We then addressed Mr. Chamberlain’s declaration and the support thereof and found insufficient support for his testimony that birds would fly or roost “in or along the perimeter of a wall within a building or structure.” *Id.* at 36–37 (citing Ex. 1004 ¶¶ 32, 33; Ex. 1018, 81, 85.)

As such, Mr. Chamberlain’s testimony is entitled to little weight. *See Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 (Aug. 24, 2022) (precedential) (denying institution and holding that a declaration is entitled to little weight when it contains an exact restatement of the petition’s arguments without any additional supporting evidence or reasoning); *see also* 37 C.F.R. § 42.65(a) (“Expert testimony that does not disclose the underlying facts or data on which the opinion is based is entitled to little or no weight.”); *see also Upjohn Co. v. Mova Pharm. Corp.*, 225 F.3d 1306,

1311 (Fed. Cir. 2000) (“Lack of factual support for expert opinion to factual determinations . . . may render the testimony of little probative value in a validity determination.”) (quotation omitted); *see also Carella v. Starlight Archery & Pro Line Co.*, 804 F.2d 135, 138 (Fed. Cir. 1986) (“Although in some circumstances unsupported oral testimony can be sufficient to prove prior knowledge or use, it must be regarded with suspicion and subjected to close scrutiny.”).

Petitioner argues that we overlooked Tuttle as evidence in support of Dr. Chamberlain’s testimony. Reh’g Req. 8. We disagree. We addressed Tuttle in our Decision and explained that we found that it did not support Dr. Chamberlain’s position. Dec. 36–37 (citing Ex. 1004 ¶¶ 32, 33; Ex. 1018, 81, 85). A request for rehearing under 37 C.F.R. § 42.71(d) is not an opportunity for Petitioner to simply reargue issues we previously addressed.

For the foregoing reasons, Petitioner does not show that the Board overlooked or misapprehended any arguments under this subheading (II)(A)(2). *See* 37 C.F.R. § 42.71(d).

3. “The Board misapprehended Petitioner’s argument that placing at least one of Brugh’s capture devices along a perimeter wall would ‘shrink the area’ where a bird is able to fly.” Reh’g Req. 9.

Petitioner contends the Board misapprehended Petitioner’s argument that a POSA would have placed Brugh’s nets proximal to the flying animal along a perimeter wall and in another location so as to effectively shrink the flying area and improve the likelihood of capture, as this placement is “nothing more than ‘a matter of basic geometry.’” Reh’g Req. 9 (citing Pet. 18; Ex. 1004 ¶ 74). Petitioner contends that “[t]he Board

misapprehended Petitioner’s argument as impermissible hindsight stemming ‘solely from the ’108 Patent.’” *Id.* at 10. We disagree.

Petitioner asserts that “neither Petitioner nor Dr. Chamberlain relied on the ’108 Patent in explaining this argument.” *Id.* (citing Pet. 18; Ex. 1004 ¶ 74); *see also id.* at 11 (“It is again self-evident that placing one of Brugh’s capture devices along a perimeter wall creates an area where a bird can no longer fly”). Petitioner repeats that its expert, “Dr. Chamberlain[,] testified that . . . a POSA would have found it ‘a matter of basic geometry’ to reduce the area in which a bird can fly by arranging at least one of Brugh’s capture devices along a perimeter wall and at least one in another location.” *Id.* at 10–11 (citing Ex. 1004 ¶ 74). Petitioner argues that “it is common sense that Brugh’s capture devices are oriented to intersect a bird’s flight path.” *Id.* at 12.

We addressed this argument in our Decision along with the particular testimony cited by Petitioner. *See* Dec. 37–38. A request for rehearing under 37 C.F.R. § 42.71(d) is not an opportunity for Petitioner to simply reargue issues we previously addressed.

As explained in our Decision, “Petitioner’s reason that placing at least one capture device along a perimeter wall ‘would effectively shrink the area in which the vertebrate is able to fly and thereby improve the likelihood of capture’ (Pet. 18) is inadequately supported by the evidence.” Dec. 37. Weighing Petitioner’s evidence, we agreed with Patent Owner that Petitioner’s reasoning was based on impermissible hindsight. *Id.* (citing Prelim. Resp. 38). We explained,

[r]ather than taught by the cited art, Petitioner’s reasoning stems solely from the ’108 patent that describes an advantage of its method and system as “an improved animal capture procedure

whereby the space the animal could escape during an attempted capture is greatly lessened due to the arrangement of the perimeter net system and trapping net system” (Ex. 1002, 3:14–19) and that “[b]y placing the perimeter net system 12 along the outer perimeter of the enclosure 36 [as shown in Figure 2], the escape routes for the animal 60 are reduced and the animal 60 can be funneled into the trapping net system 14” (*id.* at 4:38–42).

Dec. 38.

We also explained that Petitioner’s reasoning was deficient in not explaining how the paths and/or flying area would necessarily be reduced. *Id.*

For the foregoing reasons, Petitioner does not show that the Board overlooked or misapprehended any arguments under this subheading (II)(A)(3). *See* 37 C.F.R. § 42.71(d).

4. **“The Board failed to account for bias in the testimony of Patent Owner’s Founder and CEO Derek Tolley.”** Reh’g Req. 12.

Petitioner contends that the “Board’s analysis was tainted further by crediting the testimony of an interested party—Patent Owner’s Founder and CEO Derek Tolley.” Reh’g Req. 13 (citing Dec. 19; Ex. 2001 ¶¶ 1, 5, 11, 13, 15). Petitioner argues that the “Board was obligated to account for Mr. Tolley’s bias in weighing his testimony, which it did not.” *Id.* (citations omitted). We disagree.

Petitioner presumes the Board did not consider the fact that Patent Owner’s expert, Mr. Tolley, is the inventor of the ’108 patent. We considered this fact but, nevertheless, found Mr. Tolley’s testimony more persuasive than Dr. Chamberlain’s testimony. *See, e.g.*, Dec. 36 (“Based on our review of the parties’ arguments and evidence, we find that Petitioner

has not sufficiently shown that it would have been obvious to implement the specific combination of modifications Petitioner proposes to arrive at the challenged claims of the '108 patent.”). As explained above, Dr. Chamberlain did not provide sufficient evidentiary support for his testimony that birds would be observed or expected to fly along the inner perimeter of a building. As such, Dr. Chamberlain’s testimony was afforded little weight. 37 C.F.R. § 42.65(a).

Thus, Petitioner does not show that the Board overlooked or misapprehended any arguments under this subheading (II)(A)(4). *See* 37 C.F.R. § 42.71(d).

B. GROUND B – CLAIMS 1–17 AS UNPATENTABLE OVER BRUGH AND KUNZ

Petitioner contends that the “Board’s analysis was similarly misguided under Ground B.” *Reh’g* Req. 14. Petitioner argues that the “Board discounted Kunz’ [sic] disclosure as failing to teach ‘that bats tend to roost at or proximate to the perimeter wall *within a building*’” and “the Board’s analysis again ignores common sense.” *Id.* at 15 (quoting Dec. 44).

Petitioner’s argument is not persuasive. A request for rehearing under 37 C.F.R. § 42.71(d) is not an opportunity for Petitioner to simply reargue issues we previously addressed.

As explained in our Decision, Kunz does not teach that bats roost proximate to the perimeter wall within a building. Specifically, our Decision explained,

Kunz discusses netting bats at *openings* to buildings (Ex. 1010, 8 (citing Fig. 3A) (emphasis added)) and capturing bats if “the perimeters of roosts are either partially or completely surrounded by one or more nets” (*id.* at 10) (citing Fig. 4E, 4F), but Kunz

makes no assertions or statements that bats tend to roost at or proximate to the perimeter wall *within a building*.

Dec. 43–44.

Petitioner argues that the Board misapprehended its argument that Brugh discloses the concept of placing nets within a building and Kunz was relied on to answer the “only question [of] where to place Brugh’s capture device within the building” with “wherever birds are flying.” Reh’g Req. 15 (citing Pet. 28–31).

In the Petition, Petitioner asserted that “[a] POSA would be motivated to combine the teachings of Brugh and Kunz to arrive at the claimed invention,” as they both are in similar fields and “describe the use of nets suspended between poles to capture flying vertebrates,” and Kunz notes mist nets are the most common and can be deployed almost anywhere bats are expected to fly. Pet. 28. Petitioner also asserted that “Kunz would have further motivated a POSA to use a plurality of Brugh’s capture devices—specifically, at least one ‘perimeter net’ and at least one ‘trapping net’ as recited in elements [1b] and [1c].” *Id.* at 29. Petitioner also stated that “Kunz notes that it is effective to place multiple nets such that ‘the perimeters of roosts are either partially or completely surrounded by one or more nets.’” *Id.* at 30 (citing Ex. 1010, 10–11, Fig. 4).

Petitioner argued,

[i]n view of Kunz’s teachings regarding the placement of multiple nets, a POSA would have found it obvious (and would have been motivated) to observe the flyways of flying vertebrates in a building *and place multiple nets (e.g., at least one perimeter net and at least one trapping net) within the building* for the purpose of effectively capturing the identified flying vertebrates. Ex-1004, ¶98. Moreover, although not required by Claim 1, a POSA would have found it further obvious in view of Kunz to

specifically (i) install one of Brugh's capture devices along a perimeter wall within a building and (ii) at least one of Brugh's capture devices in additional locations (e.g., around the interior of the building). In view of Kunz, installation of Brugh's capture device in this way (e.g., in response to observing flyways in these locations) would have predictably resulted in an effective capture system within the building. *Id.* Accordingly, elements [1b] and [1c] would have been obvious to a POSA in view of Brugh and Kunz (Ground B).

Pet. 30 (emphasis added).

Thus, Petitioner did not rely on Kunz solely for placing devices wherever the birds are flying but for placing the nets in the specific locations recited in the claim—at or along the inside perimeter of a building or structure and at another location within the building. Moreover, as discussed in the Decision, Kunz notes that it is effective to place nets at openings to buildings and at perimeters of roosts, but “makes no assertions or statements that bats tend to roost at or proximate to the perimeter wall within a building.” Dec. 43–44.

For the foregoing reasons, Petitioner does not show that the Board overlooked or misapprehended any arguments under this subheading (II)(B). *See* 37 C.F.R. § 42.71(d).

C. SUMMARY

Having considered Petitioner's Request, we deny the Request for the foregoing reasons.

III. OUTCOME OF THE DECISION ON REHEARING

Claim	35 U.S.C. §	References	Denied	Granted
1–17	103	Brugh	1–17	
1–17	103	Brugh, Kunz	1–17	
Overall Outcome			1–17	

IV. ORDER

For the reasons given, it is:

ORDERED that Petitioner’s Request is *denied*.

IPR2022-01254
Patent 10,729,108 B2

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