

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DAYUS REGISTER & GRILLE, INC.,
Petitioner,

v.

INV HOLDINGS INC.,
Patent Owner.

IPR2022-01475
Patent 10,871,305 B2

Before KEVIN W. CHERRY, JAMES J. MAYBERRY, and
CYNTHIAL. MURPHY, *Administrative Patent Judges*.

CHERRY, *Administrative Patent Judge*.

DECISION
Granting Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

Dayus Register & Grille, Inc. (“Petitioner”) filed a petition for *inter partes* review of claims 1–4, 8–11, and 14–16 of U.S. Patent No. 10,871,305 B2 (“the ’305 patent,” Ex. 1001). Paper 1 (“Pet.”). INV Holdings Inc. (“Patent Owner”) filed a Preliminary Response. Paper 5 (“Prelim. Resp.”).

We have authority under 35 U.S.C. § 314 to determine whether to institute an *inter partes* review. The standard for instituting an *inter partes* review is set forth in 35 U.S.C. § 314(a), which provides that an *inter partes* review may not be instituted unless “there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” The Supreme Court has held that the Board, in a decision to institute under 35 U.S.C. § 314(b), may not institute review on less than all claims challenged in the petition. *SAS Inst. Inc. v. Iancu*, 138 S. Ct. 1348, 1355–56 (2018). Moreover, in accordance with our rules, “[w]hen instituting *inter partes* review, the Board will authorize the review to proceed on all of the challenged claims and on all grounds of unpatentability asserted for each claim.” 37 C.F.R. § 42.108(a) (2020); *see also PGS Geophysical AS v. Iancu*, 891 F.3d 1354, 1360 (Fed. Cir. 2018) (interpreting the statute to require “a simple yes-or-no institution choice respecting a petition, embracing all challenges included in the petition”).

Applying the above standards, and upon considering the Petition, the Preliminary Response, and the evidence of record, we determine the information presented shows a reasonable likelihood that Petitioner would prevail in establishing the unpatentability of at least one of the challenged claims of the ’305 patent. Accordingly, we institute an *inter partes* review

of all challenged claims (i.e., claims 1–4, 8–11, and 14–16) of the ’305 patent, based on the grounds asserted in the Petition.

II. BACKGROUND

A. Real Parties in Interest

Petitioner and Patent Owner each identify themselves as the real party in interest. Pet. 67; Paper 4, 1 (Patent Owner’s Mandatory Notices).

B. Related Matters

The parties identify *INV Holdings Inc. et al. v. Dayus Register & Grille, Inc.*, Case No. 2:21-cv-05107-GRB-ST (E.D.N.Y.), filed September 14, 2021, as a related matter involving the ’305 patent. Pet. 67; Paper 4, 1–2.

C. Overview of the ’305 Patent (Ex. 1001)

The ’305 patent, titled “Dry Wall Extrusion Grille,” relates to an extrusion grille having a frame, a linear bar grille, pre-perforated through holes, indented slots, and a flexible edge. Ex. 1001, code (54), 1:10–12. Figure 1 of the ’305 patent, reproduced below, is a top view of an extrusion grille frame. *Id.* at 3:34.

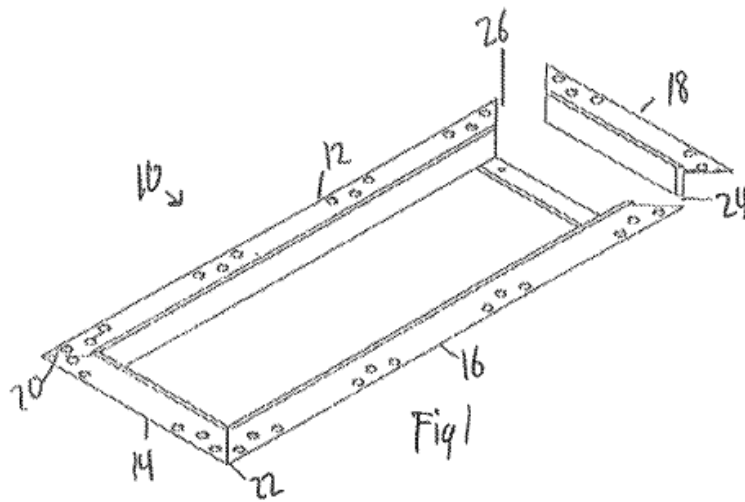
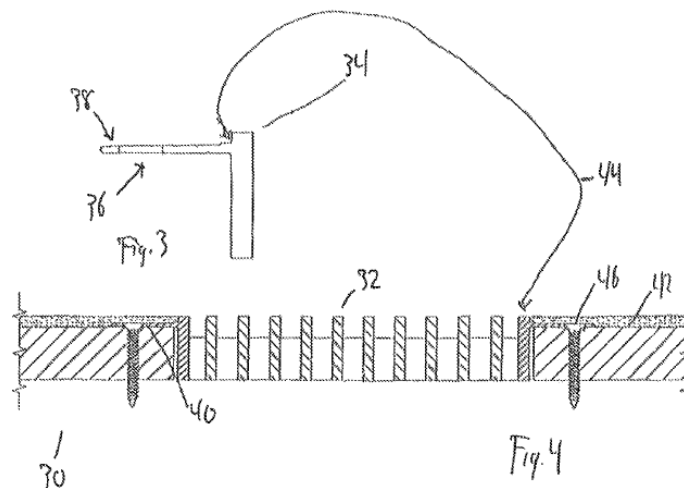


Figure 1 of the '305 patent, above, depicts frame 10 including four mitered pieces welded together. *Id.* at 3:59–61. Figures 3 and 4 of the '305 patent, reproduced below, show a cross-section view of an extrusion grille. *Id.* at 3:37–40.



Figures 3 and 4 of the '305 patent, above, depict extrusion grille 30 comprising linear bar grille 32, aluminum profile 34, flexible mounting flange 36 with perforated through holes 40 for sheet rock screws 46, and indented slots 38 for capturing joint compound or plaster 42. *Id.* at 3:62–67.

Figure 6, reproduced below, shows a front view of the extrusion grille. *Id.* at 3:43–44.

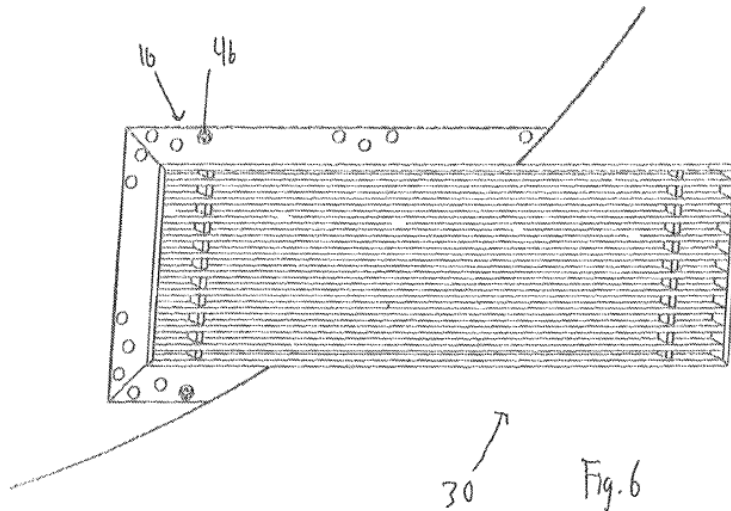


Figure 6 of the '305 patent, above, depicts extrusion grille 30 with frame 10 installed using sheet rock screw 46 and partially covered with plaster or joint compound. *Id.* at 4:9–12.

D. The Challenged Claims

Petitioner challenges claims 1–4, 8–11, and 14–16 of the '305 patent. Pet. 1. Of the challenged claims, claims 1, 8, and 11 are independent. Claim 1, reproduced below with Petitioner's identifiers for the claim limitations added (*see id.* at 33–43), is illustrative of the subject matter recited in the challenged claims.

1. [pre] A dry wall extrusion grille comprising:
 - [a] a frame;
 - [b] a linear bar grille located in said frame comprised of vanes and cross members that direct a flow of air;
 - [c] indented slots;
 - [d] through holes;
 - [e] a flexible mounting flange located between a top and bottom edge of the frame extending outwardly from said frame;

[f] said indented slots defined as small recesses in said flexible mounting flange that receive plaster, joint compound or mud;

[g] wherein said extrusion grille is used with a fixed core, a core welded directly to said frame, or a removable core.

Ex. 1001, 4:49–62.

E. Evidence

Petitioner’s challenges are based on the following evidence:

Evidence	Exhibit No.
Declaration of Richard T. Kaczowski (“Kaczowski Decl.”)	1003
Lennox et al., WO 2005/124054 A1 (published Dec. 29, 2005) (“Lennox”)	1004
Harris, US 3,996,845 (issued Dec. 14, 1976) (“Harris”)	1005
Nailor Industries Inc., “Linear Slot Diffusers Extruded Aluminum Model Series: 5000,” <i>available at</i> https://web.archive.org/web/20110619013317/http://nailor.com/ (see Pet. 28–30) (“Nailor”)	1006

Patent Owner submits the following evidence:

Evidence	Exhibit No.
Declaration of Angelo Reyes Jr. (“Reyes Decl.”) ¹	2001

F. Asserted Grounds of Unpatentability

Petitioner asserts that claims 1–4, 8–11, and 14–16 of the ’305 patent are unpatentable on the following grounds:

Ground	Claim(s) Challenged	35 U.S.C. §²	Reference(s)/Basis
1	1–4, 8, 9, 11, 14–16	§§ 102(a)(1)/103	Lennox

¹ Patent Owner incorrectly refers to this declaration as Exhibit 1032.

² The Leahy-Smith America Invents Act, Pub. L. No. 112-29, 125 Stat. 284 (2011) (“AIA”), amended 35 U.S.C. § 103. The ’305 patent claims benefit

Ground	Claim(s) Challenged	35 U.S.C. § ²	Reference(s)/Basis
2	1–4, 8–11, 14–16	§ 103	Lennox, Harris, Nailor

Pet. 33. Patent Owner disputes Petitioner’s asserted grounds of unpatentability. *See generally* Prelim. Resp.

III. DISCRETION UNDER 35 U.S.C. § 314(a)

Patent Owner argues that we should exercise our discretion under 35 U.S.C. § 314(a) and deny institution of *inter partes* review. Prelim. Resp. 46–47. Petitioner opposes. Pet. 63–67. For the reasons discussed below, we do not exercise discretion to deny institution.

Section 314(a) does not require the Director to institute an *inter partes* review. *See Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1367 (Fed. Cir. 2016) (“[T]he PTO is permitted, but never compelled, to institute an IPR proceeding.”). Rather, a decision whether to institute is within the Director’s discretion, and that discretion has been delegated to the Board. *See* 37 C.F.R. § 42.4(a); *Cuozzo Speed Techs., LLC v. Lee*, 136 S. Ct. 2131, 2140 (2016) (“[T]he agency’s decision to deny a petition is a matter committed to the Patent Office’s discretion.”).

Patent Owner argues that we should exercise our discretion under 35 U.S.C. § 314(a) to deny institution in view of the parallel district court litigation involving the challenged claims (“the Parallel Proceeding”). Prelim. Resp. 46. Petitioner contends that discretionary denial is not appropriate in this case “at least because of (i) Petitioner’s *Sotera* [Wireless,

of a January 6, 2014 priority date, which is after the effective date of the applicable AIA amendments. Ex. 1001, code (63). Thus, we refer to the AIA version of 35 U.S.C. §§ 102 and 103.

Inc. v. Masimo Corp., IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential as to § II.A)] stipulation, which is dispositive on the question of discretionary denial.” Pet. 64. In particular, Petitioner

stipulates that, if IPR is instituted on the grounds set forth in this Petition, it will not pursue in the Parallel Proceeding the specific grounds asserted in the Petition against the challenged claims, or any other ground that could have been reasonably raised in the Petition against the challenged claims.

Id. at 65 (citing *Sotera*, Paper 12 at 13–14).

We will not discretionarily deny institution in view of parallel district court litigation when a petitioner stipulates not to pursue in that parallel litigation the same grounds as in the petition or any grounds that could have reasonably been raised in the petition. See Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation, 3, 7–8.³ Because Petitioner presents a stipulation not to pursue in a parallel proceeding the same grounds or any grounds that could have reasonably been raised before the PTAB, we decline to exercise our discretion under § 314(a) to deny institution of *inter partes* review.

IV. PATENTABILITY ANALYSIS

Petitioner contends that claims 1–4, 8, 9, 11, and 14–16 of the ’305 patent are unpatentable under 35 U.S.C. § 102 as anticipated by Lennox, or, in the alternative, under 35 U.S.C. § 103 as obvious over Lennox, and claims

³ Available at https://www.uspto.gov/sites/default/files/documents/interim_proc_discretionary_denials_aia_parallel_district_court_litigation_memo_20220621_.pdf.

1–4, 8–11, and 14–16 are unpatentable under 35 U.S.C. § 103 as obvious over Lennox, Harris, and Nailor. Pet. 33–63.

We organize our patentability analysis into five sections. First, we identify the applicable principles of law. Second, we address the level of ordinary skill in the art. Third, we address claim construction. Fourth, we provide an overview of the asserted references. Finally, we address Petitioner’s asserted grounds of unpatentability and, taking account of the information presented, consider whether the Petition satisfies the threshold requirement for instituting an *inter partes* review under 35 U.S.C. § 314(a).

A. Principles of Law

Anticipation under 35 U.S.C. § 102 requires that a prior art reference set forth each and every element of a claim as set forth in the claim. *Verdegaal Bros. v. Union Oil Co. of Cal.*, 814 F.2d 628, 631 (Fed. Cir. 1987); *see also Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1371 (Fed. Cir. 2008) (anticipation not only requires that each element of a claim be present in a prior art reference, but also the “arrangement or combination” of those elements).

A patent claim is unpatentable under 35 U.S.C. § 103 if the differences between the claimed subject matter and the prior art are such that the subject matter, as a whole, would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007). The question of obviousness is resolved on the basis of underlying factual determinations including: (1) the scope and content of the prior art; (2) any differences between the claimed subject matter and the prior art; (3) the level of ordinary skill in the art; and (4) when in evidence, objective

evidence of nonobviousness.⁴ *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966).

“In an [*inter partes* review], the petitioner has the burden from the onset to show with particularity why the patent it challenges is unpatentable.” *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1363 (Fed. Cir. 2016) (citing 35 U.S.C. § 312(a)(3) (requiring *inter partes* review petitions to identify “with particularity . . . the evidence that supports the grounds for the challenge to each claim”)). This burden of persuasion never shifts to Patent Owner. *See Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.*, 800 F.3d 1375, 1378 (Fed. Cir. 2015) (discussing the burden of proof in *inter partes* review).

B. Level of Ordinary Skill in the Art

We consider the asserted grounds of unpatentability in view of the understanding of a person of ordinary skill in the art (“POSITA”). In assessing the level of ordinary skill in the art, various factors may be considered, including the “type of problems encountered in the art; prior art solutions to those problems; rapidity with which innovations are made; sophistication of the technology; and educational level of active workers in the field.” *In re GPAC Inc.*, 57 F.3d 1573, 1579 (Fed. Cir. 1995) (quoting *Custom Accessories, Inc. v. Jeffrey-Allan Indus., Inc.*, 807 F.2d 955, 962 (Fed. Cir. 1986)). “[O]ne or more factors may predominate.” *Id.*

Petitioner contends that an ordinarily skilled artisan for the ’305 patent “would have been an individual with at least a Bachelor’s degree in

⁴ Patent Owner does not present arguments or evidence of secondary considerations in its Preliminary Response. Therefore, secondary considerations do not constitute part of our analysis herein.

engineering, or at least 3 years of experience designing, manufacturing, installing, and/or finishing drywall using accessories such as grilles or grates.” Pet. 12 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 65). For purposes of the Preliminary Response, Patent Owner does not dispute Petitioner’s proposal. Prelim. Resp. 4–5.

Based on this record, we adopt Petitioner’s articulation of the level of ordinary skill in the art, which is consistent with the ’305 patent and the asserted prior art, and we apply it in our obviousness evaluations below. *See Okajima v. Bourdeau*, 261 F.3d 1350, 1355 (Fed. Cir. 2001) (the prior art, itself, can reflect appropriate level of ordinary skill in art).

C. Claim Construction

In interpreting the claims of the ’305 patent, we “us[e] the same claim construction standard that would be used to construe the claim[s] in a civil action under 35 U.S.C. [§] 282(b).” *See* 37 C.F.R. § 42.100(b) (2020). The claim construction standard includes construing claims in accordance with the ordinary and customary meaning of such claims as would have been understood by one of ordinary skill in the art and the prosecution history pertaining to the patent. *See id.*; *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312–14 (Fed. Cir. 2005) (*en banc*).

1. “Dry wall extrusion grille”

Petitioner contends that the preamble phrase “dry wall extrusion grille” of claim 1 is not limiting. Pet. 13. Petitioner contends that the preamble phrase “does not recite any essential structure or steps, nor is it necessary to give life, meaning, or vitality to the claim[s].” *Id.* at 14.

Petitioner also contends that, “if the Board determines that the preamble of claim 1 is entitled to patentable weight, then it should be

construed to mean ‘a grille, for use with dry wall, which was made at least in part by a process of forcing material through a die to form a desired shape.’” Pet. 18 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 37). According to Petitioner, asserted “Ground 1 utilizes a construction for the preamble that is non-limiting, while Ground 2 utilizes the alternative construction for the preamble.” *Id.* at 19.

Patent Owner argues that the preamble recitation “is limiting, as it is ‘necessary to give life, meaning, and vitality’ to those claims, the body of the claims rely on and derive antecedent basis from the preamble, and the preamble was relied upon to overcome patentability rejections during prosecution of that patent.” Prelim. Resp. 8 (citing Ex. 2001 (Reyes Decl.) ¶ 28). Patent Owner asserts that a “POSITA would have understood the term ‘dry wall extrusion grille’ to mean ‘a grille used for dry wall, including sheet rock, gypsum, cement board, wall board, plaster and green board, which is formed via the process of a high pressure force pushing material through a die,” and “[i]t does not necessarily mean that all parts are formed by a process of extrusion.” *Id.* at 9–10 (citing Ex. 2001 (Reyes Decl.) ¶ 29).

Because we find that Petitioner has shown a reasonable likelihood of prevailing on the second challenge—the combination of Lenox, Harris and Nailor— under either party’s construction of the preamble, we find that no construction of the preamble is necessary at this time. *See Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017) (holding that only claim terms in controversy need to be construed, and only to the extent necessary to resolve the controversy (citing *Vivid Techs., Inc. v. Am. Sci. & Eng’g, Inc.*, 200 F.3d 795, 803 (Fed. Cir. 1999))).

2. “Flexible”

Both parties seek construction of the term “flexible.” See Pet. 19; Prelim. Resp. 10–11. Here, we find that none of the patentability challenges raised in the Petition turn on the meaning of the term “flexible.” Accordingly, we determine that no construction of the term is necessary. See *Nidec*, 868 F.3d at 1017.

3. Remaining Terms

At this time, we determine that no further express construction of other terms is necessary for purposes of this Decision. See *Vivid Techs.*, 200 F.3d at 803.

D. Overview of Asserted Prior Art

Before turning to Petitioner’s asserted grounds of unpatentability, we provide brief summaries of the asserted references.

1. *Lennox* (Ex. 1004)

Lennox is a WIPO publication titled “A Device and Method for Flush Mounting Air Duct Grates, Electrical Switch Plates, Electrical Receptacle Plates, Electrical Light Fixtures and Other Drywall Aperture Covers on Drywall Surfaces Using Drywall Bead.” Ex. 1004 (Lennox), code (54). Lennox “relates to the finishing of an aperture in a drywall surface to accept a flush mounted cover or insert therein.” *Id.* at 3. Lennox discloses a “finished drywall aperture which may optionally accept a variety of fixed or removable aperture inserts such that the outer surface of the aperture inserts are substantially flush with the outer surface of the sheet or sheets of drywall through which the aperture is located.” *Id.* at 8.

Figure 12 of Lennox, reproduced below, is a front view of a drywall aperture according to one embodiment. *Id.* at 12.

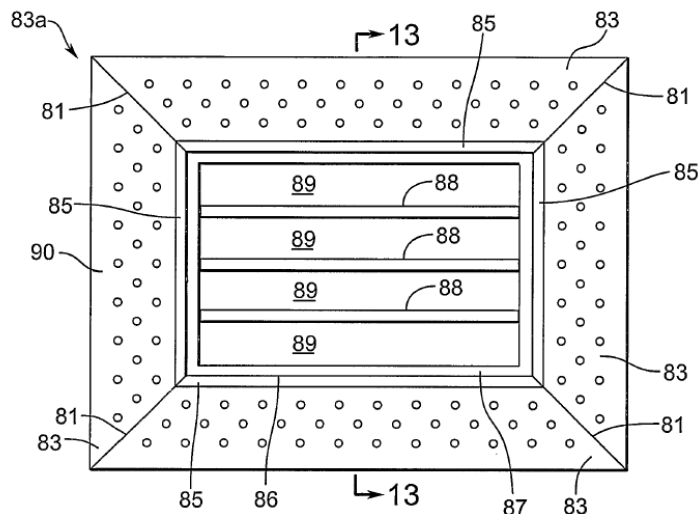


FIG. 12

Figure 12 of Lennox, reproduced above, depicts bead plate 83a with flange 83 and air grate 87. *Id.* at 19. Air grate 87 includes air passages 89 and linear air passage dividers 88. *Id.* The flange 83 has a multitude of apertures and Lennox teaches that such apertures can be “used to hold drywall screws and/or to act as a gripping surface for drywall compound.” *Id.* at 15.

Figure 13 of Lennox, reproduced below, shows a side view of the bead plate and air grate insert of Figure 12. *Id.* at 12.

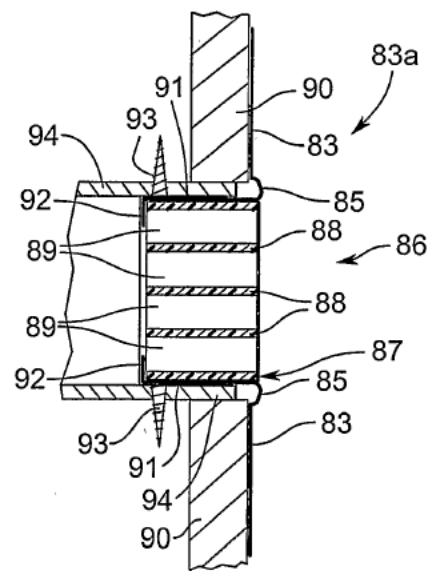


FIG. 13

Figure 13 of Lennox, above, depicts bead plate 83a having flange 83, bead 85, and interior flanges 91. *Id.* at 19. Lennox discloses that “[i]nterior flanges 91 are provided with a tab at the outer edge of flanges 91 which align the front surface of air grate 87 of predetermined depth with the outer drywall surface created by feathering drywall compound from the crest of bead 85 over flange 83 and smoothly positioning into the adjoining drywall surface.” *Id.*

2. Harris (Ex. 1005)

Harris is a U.S. patent titled “Air Handling Grille and Method of Making the Same.” Ex. 1005 (Harris), code (54). Harris discloses an air handling grille with frame, adjustable vanes, and bearing members. *Id.* at 1:17–27. Figure 1 of Harris, reproduced below, is an exploded view of an air handling grille. *Id.* at 1:43–45.

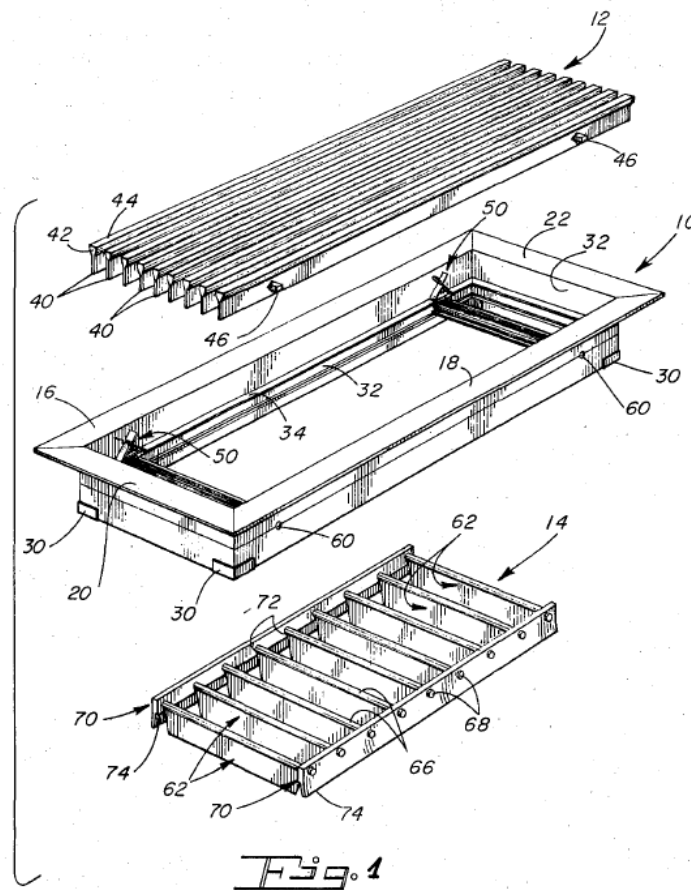


Figure 1 of Harris, above, depicts an air handling grille comprising open rectangular frame 10 and elongated air directing vanes 12 and 14. *Id.* at 1:66–2:45. Frame 10 preferably is constructed of extruded aluminum sections, each having a generally L-shaped cross section with laterally-outward projecting flange. *Id.* at 2:9–16. Vanes 12 includes a spaced parallel series of elongated air directing vanes 40 having extruded aluminum construction. *Id.* at 2:65–67, 3:1–5. “[C]ross members 46, 46 secure the vanes 40, 40 if the series in preassembled spaced parallel arrangement.” *Id.* at 5:6–8.

3. Nailor (Ex. 1006)

Nailor is a publication titled “Linear Slot Diffusers Extruded Aluminum Model Series: 5000.” Ex. 1006, 1. Nailor includes a figure showing a Type J linear slot diffuser (“Figure J”), which is reproduced below.

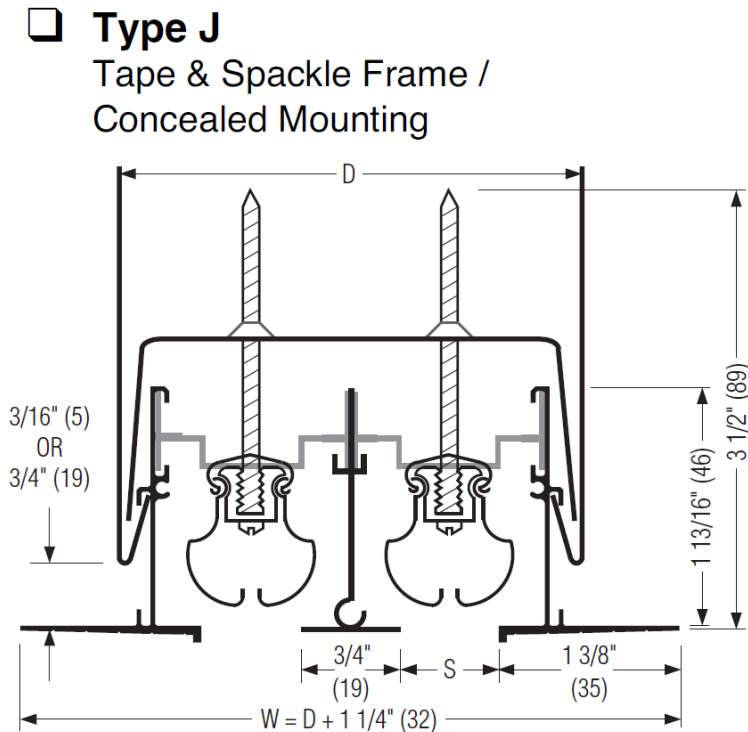


Figure J of Nailor depicts a linear slot diffuser with extruded aluminum tape and spackle frame. *Id.*

E. Ground 2 – Alleged Obviousness Over Lennox, Harris, and Nailor

Petitioner asserts that claims 1–4, 8–11, and 14–16 are unpatentable as obvious over Lennox, Harris, and Nailor. Pet. 50–63. Patent Owner opposes. Prelim. Resp. 31–46. Having considered the arguments and evidence before us, we determine that the record establishes a reasonable likelihood that Petitioner would prevail on this asserted ground of unpatentability.

1. Nailor as Prior Art

Petitioner contends that Nailor is a printed publication that was available and publicly-accessible no later than November 29, 2011. Pet. 28. In particular, Petitioner contends that “Nailor was accessible to the public as of at least November 29, 2011 through Nailor’s website, as it evident from the Internet Archive known as the Wayback Machine, and the Affidavits of Nathaniel Frank-White (Ex. 1028) and Silver Leach (Ex. 1029).” *Id.* at 29.

Patent Owner argues that Nailor should not be considered a printed publication qualifying as prior art. Prelim. Resp. 13–17. In particular, Patent Owner asserts the following:

Petitioner shows an enlarged annotated Figure on pg [31] of its Petition that Petitioner itself enlarged at the time it filed its Petition. Then on pg [32], Petitioner enlarged the same figure by 300%. Petitioner has not shown or provided evidence that this Figure which is not found in Ex. 1006, nor substantiated in any declaration, was seen by anyone in the public, nor does Petitioner provide any evidence that prior to the Petition that anyone had knowledge of this figure. Therefore, the enlarged annotated figures are not a printed publication and should not be used in this IPR as prior art.

Id. at 16–17.

Patent Owner does not appear to dispute, at this time, that Petitioner has made a reasonable showing that Nailor—the document in the record as Exhibit 1006, including the figures, without magnification, was publicly accessible. Nor does Patent Owner dispute that the figures accurately represent enlargements of the figures shown in Nailor. See Prelim. Resp. 17 (acknowledging that “the original figure of Nailor that is found on the Internet has been enlarged by 300%”). Instead, Patent Owner argues that Petitioner must make an additional showing that the magnified drawings,

already existed and these magnifications were publicly accessible, we disagree. A party is allowed to magnify and annotate figures to aid its presentation in its papers. *See Lubanski v. Coleco Indus., Inc.*, 929 F.2d 42, 48 (1st Cir. 1991) (allowing photographs and enlargements of photographs, if “the photograph depicts a correct likeness of the scene it purports to represent”); *Durant v. Surety Homes Corp.*, 582 F.2d 1081, 1089 (7th Cir. 1978) (allowing using of “blowups of otherwise admissible pictures” noting “[e]nlarged photographs are frequently used in trials”). Petitioner clearly labels the figures as annotated and enlarged. *See* Pet. 30–32 (labeling drawings as enlarged and annotated). Moreover, contrary to Patent Owner’s argument that the figures are not “substantiated in any declaration,” Petitioner’s expert provides similar enlargements and annotations and explains what they are. Ex. 1003 (Kaczkowski Decl.) ¶¶ 56, 57. As Patent Owner acknowledges and we have confirmed, the figures appear to accurately represent 300% magnification of portions of Exhibit 1006. *See* Prelim. Resp. 17. “It is well settled that a prior art reference is relevant for all that it teaches to those of ordinary skill in the art.” *In re Fritch*, 972 F.2d 1260, 1264 (Fed. Cir. 1992). Thus, we disagree with Patent Owner that Petitioner needed to separately show that the enlargements were publicly accessible apart from showing that Nailor was publicly accessible. We have reviewed Petitioner’s evidence that Nailor was publicly accessible before the effective filing date of the ’305 patent. *See* Pet. 29–30 (citing Ex. 1030 ¶ 5; Ex. 1028 ¶ 5–7; Ex. 1029 ¶¶ 5–7). On this record, we find that it is sufficient to establish a reasonable likelihood that Nailor qualifies as prior art in this proceeding. *See Hulu, LLC v. Sound View Innovations, LLC*, IPR2018-01039, Paper 29 (PTAB Dec. 20, 2019) (precedential). We

address Patent Owner’s other arguments about whether Nailor teaches indented slots, or not, Prelim. Resp. 17, below.

2. Analysis of Independent Claim 1

a. Preamble [1pre]: A dry wall extrusion grille comprising:

Petitioner contends that, “if the preamble is deemed to be limiting, then it should be construed to mean ‘a grille, for use with dry wall, which was made at least in part by a process of forcing material through a die to form a desired shape.’” Pet. 51 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 101). Petitioner contends that Lennox discloses “a grille that is intended to be used in connection with drywall.” *Id.* (citing Ex. 1004 (Lennox), code (57)). Petitioner also contends that, although “Lennox does not teach any particular process by which those grilles are made, a POSITA would have understood that as of January 2014, extrusion was one method of making those materials, particularly given the ubiquity of references, dating back decades, that disclose extrusion as such a method.” *Id.* (citing Ex. 1003 (Kaczkowski Decl.) ¶ 102).

In particular, Petitioner contends that Harris discloses air handling grilles with an open rectangular frame that is made of extruded aluminum. Pet. 52 (citing Ex. 1005 (Harris), 2:9–13, 2:35, 3:1–5, 3:59–60, 4:21–27). Petitioner contends that “[a] POSITA would have been motivated to combine Lennox with Harris to produce the subject grille through an extrusion process because of the well-known economic advantages of doing so (i.e., it is typically cheaper to use extrusion to produce metal or aluminum grilles than other, alternative processes).” *Id.* (citing Ex. 1003 (Kaczkowski Decl.) ¶ 105).

Patent Owner argues that, “[a]lthough Harris and Nailor teach frames that may comprise extruded aluminum, neither Harris nor Nailor teach a linear bar grille.” Prelim. Resp. 31. Patent Owner also asserts that “there is no reason to combine Harris and Nailor with Lennox since Lennox has 32 figures and 29 pages of text, none of which teach or make obvious a drywall extrusion grille.” *Id.* at 31–32 (citing Ex. 2001 (Reyes Decl.) ¶ 64).

We find that Petitioner has shown sufficiently that the combination accounts for the preamble, regardless of whether or not it is limiting. Patent Owner’s arguments that Harris and Nailor do not teach a “linear bar grille” are not persuasive because Petitioner relies on Lennox for that limitation. As for the reason to combine, we find that Petitioner has shown a sufficient reason to combine. As Petitioner explains, extrusion is a well-known manufacturing process with known economic advantages, which at this stage, is a sufficient motivation to combine the teachings of Lennox with Harris and Nailor. *See Ritchie v. Vast Resources, Inc.*, 563 F.3d 1334, 1337 (Fed. Cir. 2009) (noting “efforts at routine experimentation with different standard grades of a material used in a product—standard in the sense that their properties, composition, and method of creation are well known, making successful results of the experimentation predictable” generally are obvious); *see also KSR*, 550 U.S. at 417 (noting “if a technique has been used to improve one device, and a person of ordinary skill in the art would recognize that it would improve similar devices in the same way, using the technique is obvious unless its actual application is beyond his or her skill.”).

b. Limitation [1a]: a frame;

Petitioner contends that Lennox discloses “a grille for use with drywall having a frame (which is described as element 83a and depicted in Figure 12 of Ex. 1004).” Pet. 53 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 106). Petitioner also contends that “Harris and Nailor likewise disclose this limitation, as they also describe/depict such a frame (Ex. 1005 (element 10 in Figure 1); *see also* Ex. 1006).” *Id.* (citing Ex. 1003 (Kaczkowski Decl.) ¶ 106).

Patent Owner argues that, “[a]lthough Lennox teaches a frame, it is not a frame associated with grille, and specifically not a linear bar grille.” Prelim. Resp. 32. Patent Owner asserts that “Fig 12 of Lennox does not teach or make obvious a drywall extrusion grille with a frame,” and, “[f]urther, Harris and Nailor do not teach or make obvious a frame associated with a grille, and specifically not a linear bar grille.” *Id.* (citing Ex. 2001 (Reyes Decl.) ¶ 65).

We find that Petitioner has shown sufficiently that Lennox discloses a “frame.” *See* Pet. 53 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 106). Patent Owner’s arguments deal with other limitations—“drywall extrusion grill” and “associated grille,” which we address when discussing those particular limitations.

In view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1a].

c. Limitation [1b]: a linear bar grille located in said frame comprised of vanes and cross members that direct a flow of air;

Petitioner contends that Lennox discloses “embodiments that include ‘hot and cold forced air grates,’ (ex. 1004 at 8), which would have been

understood by a POSITA to include linear bar grilles, which in turn would have been understood to include "vanes and cross members that direct a flow of air." Pet. 53 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 107). Petitioner contends that "Harris likewise teaches an extrusion grille with this element, noting that '[a]s best illustrated in Fig. 2 . . . elongated square cross members **46,46** secure the vanes **40,40** . . . within the frame **10**.'" *Id.* (citing Ex. 1005 (Harris), 3:5–22).

Patent Owner argues that "Lennox does not teach or make obvious a linear bar grille that is comprised of vanes and cross members," and "[t]here is no reason to add cross members to the devices shown in the Figures of Lennox from Harris, as it would change the function of those devices." Prelim. Resp. 32. Patent Owner also argues that "[i]n the 32 figures and 29 pages of text, there is not one mention of a linear bar grille, not one teaching of a cross member," and "[t]here is no reason for a POSITA to understand that a linear bar grille could be found in Lennox when it is not." *Id.* at 22. Patent Owner submits that "Petitioner's expert points to Figure 12, which is not a linear bar grille and does not teach cross members." Patent Owner contends that "Mr. Reyes does not understand how Petitioner's expert can argue that Lennox teaches a linear bar grille." *Id.* at 22–23 (citing Ex. 2001 ¶ 72). Patent Owner argues that "when Lennox shows 32 different embodiments, none of which are a linear bar grille, it would not be obvious for a POSITA to modify one of the 32 embodiments to be a linear bar grille." Patent Owner also asserts that "Nailor does not teach cross members." *Id.*

We agree with Petitioner that the combination of Lennox and Harris accounts for this limitation. First, "[t]he specific limitation need not be

disclosed in haec verba in the reference.” *In re Bode*, 550 F.2d 656, 660 (CCPA 1977). Thus, the lack of the term “linear bar grille” in Lennox means little, by itself. Second, we note that Lennox does disclose “air grate insert,” shown in Figures 12 that may be inserted into its frame. *See* Ex. 1004 (Lennox), Figs. 12, 13. We note this “air grate insert” appears to be made of linear bars and appears to be a similar structure to numerous other grills that Petitioner identifies in the prior art—that Mr. Kaczkowski discusses in this declaration, including Harris. *See* Ex. 1003 (Kaczkowski Decl.) ¶¶ 14 (discussing Ex. 1013), 15 (discussing Ex. 1016), 52 (discussing Harris). The “air grating insert” Lennox also appears to be similar to in structure to the “linear bar grille” disclosed in the challenged patent. Patent Owner’s expert asserts that “a grating and a grille are understood as two different terms, and specifically a grating is not a linear bar grille.” Ex. 2001 (Reyes Decl.) ¶ 39. However, Mr. Reyes provides no support or explanation for his assertion. Mr. Reyes does not provide any explanation of how, specifically, they are different, or any cite to any support for his assertion. Conclusory expert testimony that provides no citations or reasoning to support its assertions are entitled to little weight. *See Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 12 (PTAB Feb. 10, 2023) (Decision by the Director) (determining “the Board was correct in giving little weight to Petitioner’s expert because the expert declaration merely offered conclusory assertions without underlying factual support”); *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.”). Moreover, Petitioner cites U.S. Patent No. 4,098,257 (Exhibit 1021), which uses the terms “grille” and “grating” interchangeably,

suggesting that Mr. Reyes’s assertion is not correct. Thus, we find that Petitioner has shown sufficiently that Lennox discloses a “linear bar grille.”

We also find that Petitioner has shown sufficiently that Figures 12 and 13 disclose the “air grating insert” of Lennox has “vanes.” See Pet. 36 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 74). To the extent that Lennox does not disclose “cross members,” we find that Petitioner has shown that Harris discloses the claimed cross members. See *id.* at 53 (citing Ex. 1005 (Harris), 3:5–22; Ex. 1003 (Kaczkowski Decl.) ¶ 107).

We also find that Petitioner has provided an adequate motivation to combine Lennox’s “linear bar grille” with the “cross members” of Harris. See Pet. 37. As Petitioner explains, “it would have been obvious to modify the embodiment show in Figures 12 and 13 [of Lennox] to include cross members, as this was well known to permit better control over the direction of air flow, which was regarded as a desirable quality of air vent covers at that time.” *Id.* (citing Ex. 1003 (Kaczkowski Decl.) ¶ 75). At this stage of the proceeding, we find that this motivation is sufficient.

In view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1b].

d. Limitation [1c]: indented slots;

Petitioner contends that Lennox discloses limitation [1c] for the same reasons discussed in connection with Ground 1. Pet. 54 (citing Ex. 1003 (Kaczkowski Decl.) ¶¶ 108–108); see also *id.* at 37–39 (addressing limitation [1c] under Ground 1). Petitioner also contends that “Nailor’s J-Type drawing depicts these indented slots in precisely the same way as Figure 3 of the [’]305 patent.” *Id.* at 54. Petitioner contends that a

[Person of ordinary skill in the art] would have been motivated to combine the particular indented slots taught by Nailor’s J-Type embodiment with Lennox’s air grate made according to the extrusion process in Harris, because it was well-known that the sort of small recesses in Nailor would have furthered Lennox’s goal of “gripping the drywall compound to be applied over the corner bead and feathered over flange 50,” (Ex. 1004 at 13), by increasing the surface area for that compound to attach to, as taught by multiple prior art references.

Id. at 54–55 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 100; Ex. 1023, Fig. 2, 2:20–22; Ex. 1024 ¶ 21).

Patent Owner argues that “[n]one of the prior art references teaches or makes obvious indented slots.” Prelim. Resp. 32. In particular, Patent Owner asserts that Figure 3a of Lennox “illustrates and describes elongated slots which are in no way an indented slot.” *Id.* at 33. Patent Owner asserts that “[a]n indented slot as defined in the [’]305 patent is a small recess not an elongated opening through the mounting flange.” *Id.* Patent Owner also asserts that “it would not make sense to have elongated slots and pre-perforated through holes together, and even Lennox does not show this combination, nor is there any teaching or motivation to have this in the mounting flange.” *Id.* (citing Ex. 2001 (Reyes Decl.) ¶ 67). Patent Owner also argues that “Nailor does not teach or discuss indented slots, and the fact that the teachings of Nailor teach ‘tape and spackle’ teach[es] against Nailor teaching indented slots.” *Id.*

We find that Petitioner has shown sufficiently that Nailor teaches indented slots that do not go through the flange. *See* Pet. 54 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 110). As Petitioner argues, supported by the testimony of Mr. Kaczkowski, Nailor discloses structures that appear to be nearly identical to the structures that Patent Owner identifies as “indented

slots” in the ’305 patent. *Id.* (showing comparison between Figure 3 of the ’305 patent Nailor). Patent Owner’s arguments regarding Petitioner’s magnification of Nailor’s figures are not persuasive, because there is nothing improper about magnifying a figure to better show features of the figure, as we explained above. Patent Owner also argues that Nailor’s description “that the finishing process describing the ‘Type J’ embodiment as having a ‘Tape & Spackle Frame’, . . . teaches against Nailor teaching indented slots,” because “[o]ne of the main objections of the ’305 [patent] claimed indented slots[] is not to need tape.” However, there is nothing in the claim restricting the use of tape, so we do not find this argument persuasive.

As for Patent Owner’s arguments that Petitioner has not provided a motivation for having both through holes and elongated slots, we disagree. As Petitioner explains, Lennox teaches “holes 40 typically used to accept drywall screws,” and “larger holes along the length of the flanges which are typically used to aid with retention of drywall compound typically feathered from the crest of bead 37 over flange 38, past the flange edge 40a and smoothly transitioning into the outside surface of drywall 44a.” Pet. 23 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 48; Ex. 1004 (Lennox), 11–12.) Petitioner notes that Lennox also teaches, consistent with the typical practices at the time of Lennox, the use of “elongated slots . . . for providing edges for gripping the drywall compound to be applied over the corner bead and feathered over flange 50 and onto the face of the drywall sheet to which the corner bead is being attached.” *Id.* at 23–24 (citing Ex. 1004 (Lennox), 12–13.) Petitioner explains that “[i]n contrast to the ‘holes’ that ‘help adhere flange 44 to the surface of drywall 44a by collecting glue or spray contact cement used to adhere the lower surface of flange 44 to the outer surface 44a

of a heated drywall,’ the elongated shots are for “catchment of excess glue or contact cement alternatively used for mounting the corner bead.” *Id.* at 24 (citing Ex. 1004, 12–13). Petitioner also asserts that “a [person of ordinary skill in the art] would have understood that these sorts of elongated slots, which were part of a standard set of elements to be used with extrusion drywall grilles at the time of Lennox, would typically be combined and utilized with the multiple assemblies that were depicted and discussed elsewhere in Lennox, including for instance the grille in Figure 12, so as to provide a better ‘gripping’ surface for the joint compound.” *Id.* at 38 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 77).

Petitioner also provides an adequate rationale for combining the slot structures taught by Nailor. *See* Pet. 55. In particular, Petitioner explains that “the sort of small recesses in Nailor would have furthered Lennox’s goal of ‘gripping the drywall compound to be applied over the corner bead and feathered over flange 50,’ . . . by increasing the surface area for that compound to attach to, as taught by multiple prior art references.” *Id.* (citing Ex. 1004, 13; Ex. 1003 (Kaczkowski Decl.) ¶ 100); Ex. 1023⁵ (Larson), Fig. 2, 2:20-22 (“[T]he striations serve to provide an additional high surface area to which the overapplied finishing materials can adhere.”); Ex. 1024⁶ (Davis) ¶ 21). On this record, we find this motivation to combine the teachings of Nailor with Lennox and Harris sufficient.

In view of the above, for purposes of institution, Petitioner persuasively shows that Nailor accounts for limitation [1c].

⁵ U.S. Patent No. 6,705,052 B1, iss. Mar. 16, 2004 (Ex. 1023, “Larson”).

⁶ U.S. Pub. 2007/0232217 A1, pub. Oct. 4, 2007 (Ex. 1024, “Davis”)

e. Limitation [1d]: through holes;

Petitioner contends that the combination of Lennox and Nailor discloses limitation [1d]. Pet. 55 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 111; Ex. 1004, 11, 13). Petitioner contends that Lennox discloses that “‘typical prior art corner bead’ includes a series of ‘holes 40 typically used to accept drywall screws.’” Pet. 40 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 80; Ex. 1004 (Lennox), 11, 13). In particular, Petitioner contends that Figure 5a of Lennox shows “pre-perforated through holes as element 62.” *Id.* Petitioner also contends that “it would have been immediately apparent to a [person of ordinary skill in the art] that this embodiment in Figure 5a would have been combined with the embodiments in Figures 3a, 12, and 13 to further the goals of Lennox.” *Id.*

At this stage in the proceeding, Patent Owner does not specifically dispute Petitioner’s contention that Lennox discloses limitation [1d]. See Prelim. Resp. 34 (asserting only that, “[a]lthough Lennox teaches pre-perforated through holes, it does not teach them in conjunction with indented slots and does not teach or make obvious pre-perforated through holes with a linear bar grille” (citing Ex. 2001 (Reyes Decl.) ¶ 68)).

In view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1d].

f. Limitation [1e]: a flexible mounting flange located between a top and bottom edge of the frame extending outwardly from said frame;

Petitioner contends that Lennox discloses limitation [1e] for the same reasons discussed in connection with Ground 1. Pet. 55; *see also id.* at 41–42 (addressing limitation [1e] under Ground 1, and citing to Ex. 1004, 7). Specifically, Petitioner contends that Lennox discloses a “mounting flange

both in terms of its characteristics (i.e., it is flexible), and in terms of its location in the broader apparatus (i.e., between a top and bottom edge of the frame and extending outwardly from it).” Pet. 41 (citing Ex. 1003 ¶ 81). Moreover, Petitioner contends that Lennox “emphasizes the importance of flexibility in this mounting flange, noting that ‘pliability’ of the corner bead is particularly preferred.” *Id.* (citing Ex. 1004, 7).

Petitioner also contends that “Harris and Nailor likewise disclose a grille with an outwardly extending mounting flange.” *Id.* at 55–56 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 112; Ex. 1005, 2:13–15; Ex. 1006).

At this stage in the proceeding, Patent Owner does not specifically dispute Petitioner’s contention that Lennox discloses limitation [1e]. See Prelim. Resp. 34 (asserting only that, “[a]lthough the prior art discloses a flexible mounting flange, they do not disclose this or make it obvious for a linear bar grille or that the flexible mounting flange has indented slots and pre-perforated through holes” (citing Ex. 2001 (Reyes Decl.) ¶ 69)).

In view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1e].

g. Limitation [1f]: said indented slots defined as small recesses in said flexible mounting flange that receive plaster, joint compound or mud;

Petitioner contends that the combination of Lennox, Harris, and Nailor renders obvious limitation [1f]. Pet. 56 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 113). Petitioner contends that Lennox discloses a “mounting flange both in terms of its characteristics (i.e., it is flexible), and in terms of its location in the broader apparatus (i.e., between a top and bottom edge of the frame and extending outwardly from it).” Pet. 41 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 81). Petitioner contends that Lennox “emphasizes the

importance of flexibility in this mounting flange, noting that ‘pliability’ of the corner bead is particularly preferred.” *Id.* (citing Ex. 1004 (Lennox), 7).

Patent Owner argues that “Lennox does not teach or make obvious indented slots defined as small recesses.” Prelim. Resp. 34. Patent Owner also asserts that “the combination of Lennox with Nailor and Harris also does not teach or make obvious indented slots defined as small recesses.” *Id.* (citing Ex. 2001 (Reyes Decl.) ¶ 70).

We find that Petitioner has shown sufficiently that the combination of Lennox, Harris, and Nailor accounts for this limitation. As discussed above, we find that Petitioner has shown sufficiently that Nailor accounts for the claimed indented slots. *See supra* IV.E.2.d. Thus, Patent Owner’s arguments, which are directed to alleged lack of teaching of “indented slots” are not persuasive. Moreover, Lennox discloses “slots” that are designed “for providing edges for gripping the drywall compound to be applied over the corner bead and feathered over flange 50 and onto the face of the drywall sheet to which the corner bead is being attached.” Ex. 1004 (Lennox), 13. Petitioner submits that Lennox’s references to “drywall compound” are synonymous to “mud.” Pet. 42 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 82; Ex. 1004 (Lennox), 2 (“In order to make the surface of a wall, ceiling or other surface appear continuous, drywall compound known in the trade as ‘mud’ is applied . . .”), 4 (referring to multiple different trade names of joint compounds, including “Durabond,” “Synko,” and “CGC”).)

In view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1f].

h. Limitation [1g]: wherein said extrusion grille is used with a fixed core, a core welded directly to said frame, or a removable core.

Petitioner contends that the combination of Lennox, Harris, and Nailor renders obvious limitation [1g]. Pet. 56 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 114); *see also id.* at 43 (addressing limitation [1g] under Ground 1). In particular, Petitioner contends that Lennox discloses “that the core of the grille can be fixed to the frame, and, alternatively, that the core can be removeable.” Pet. 43 (citing Ex. 1003 (Kaczkowski Decl.) ¶ 84; Ex. 1004 (Lennox), 17 (“Air grate 87 is held in place by means of friction fit but may alternatively be held in place by screws, nuts and bolts, clips, springs, or other means which would preferably allow the air grate to be removable.”)).

Petitioner also contends that, “as illustrated for instance in Figure 1 of Harris, the core of the Harris extrusion grille can be installed using ‘spring clips,’ such that the core is ‘nevertheless removable from the frame on relative forward movement from the frame.’” *Id.* (citing Ex. 1003 (Kaczkowski Decl.) ¶ 114; Ex. 1005 (Harris), 3:23–57, Fig. 1).

Patent Owner argues that “Lennox does not teach or make obvious an extrusion grille and specifically to a linear bar grille and only cites to a grate that is removable.” Prelim. Resp. 35. Patent Owner also argues that Harris and Nailor also do not teach a linear bar grille. *Id.* (citing Ex. 2001 (Reyes Decl.) ¶ 71).

As we explained above, we find that Petitioner has shown sufficiently that Lennox accounts for the linear bar grille. *See supra* IV.E.2.c. Thus, Patent Owner’s arguments, on the current record, are not persuasive. In

view of the above, for purposes of institution, Petitioner persuasively shows that Lennox discloses limitation [1g].

3. Conclusion for Claim 1

Based on our review of the current record, we determine that Petitioner has shown a reasonable likelihood of prevailing on its contention that claim 1 is unpatentable as obvious over Lennox, Harris, and Nailor.

4. Remaining Claims

We have reviewed Petitioner's cited evidence and explanation regarding why the combination of Lennox, Harris, and Nailor renders claims 2–4, 8–11, and 14–16 obvious, and find them sufficient at this stage. On this record, we determine that Petitioner has shown a reasonable likelihood of success that the combination of Lennox, Harris, and Nailor renders obvious claims 2–4, 8–11, and 14–16.

F. Ground 1 — Anticipation and Obviousness Based on Lennox

For Ground 1, Petitioner asserts that claims 1–4, 8, 9, 11, and 14–16 are unpatentable as anticipated by Lennox, or, alternatively, as obvious over Lennox. Pet. 33–50. Patent Owner opposes. Prelim. Resp. 18–31. As we preliminarily conclude that Petitioner demonstrates a reasonable likelihood of prevailing on its challenge to claims 1–4, 8–11, and 14–16 based on obviousness in view of Lennox, Harris, and Nailor, we institute review on all challenged claims on all grounds set forth in the Petition, including Petitioner's anticipation and obviousness challenges to claims 1–4, 8, 9, 11, 14–16 based on anticipation by Lennox and Obviousness in view of Lennox. *See SAS*, 138 S. Ct. at 1354; *PGS*, 891 F.3d at 1360.

V. CONCLUSION

After considering the arguments presented in the Petition, the Preliminary Response, and the evidence of record, we determine that Petitioner has demonstrated at least a reasonable likelihood of success in proving that at least one claim of the '305 patent is unpatentable. Thus, we institute an *inter partes* review of all challenged claims (i.e., claims 1–4, 8–11, and 14–16) on all grounds set forth in the Petition. Our determinations at this stage of the proceeding are based on the evidentiary record currently before us. This decision to institute trial is not a final decision as to patentability of any claim for which we have instituted an *inter partes* review. See *TriVascular, Inc. v. Samuels*, 812 F.3d 1056, 1068 (Fed. Cir. 2016) (noting that “there is a significant difference between a petitioner’s burden to establish a ‘reasonable likelihood of success’ at institution, and actually proving invalidity by a preponderance of the evidence at trial”). We will base any final decision on the full record developed during trial.

VI. ORDER

In consideration of the foregoing, it is hereby:

ORDERED that, pursuant to 35 U.S.C. § 314(a), an *inter partes* review is instituted for claims 1–4, 8–11, and 14–16 of the '305 patent on the unpatentability grounds asserted in the Petition; and

FURTHER ORDERED that pursuant to 35 U.S.C. § 314(c) and 37 C.F.R. § 42.4, notice is hereby given of the institution of a trial, which commences on the entry date of this decision.

IPR2022-01475
Patent 10,871,305 B2

For PETITIONER:

Andrew D. Gish
Edward L. Tulin
GISH PLLC
andrew@gishpllc.com
edward@gishpllc.com

For PATENT OWNER:

Philip Weiss
WEISS & WEISS
hello@weissandweisspc.com