

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
Petitioner,

v.

YECHEZKAL EVAN SPERO,  
Patent Owner.

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U.S. Patent No. 9,955,551

Case No.: IPR2023-00315

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**PATENT OWNER'S UPDATED MANDATORY NOTICE**

**I. Mandatory Notices under 37 C.F.R. § 42.8**

Pursuant to 37 C.F.R. § 42.8(a)(3), Patent Owner, Yechezkal Evan Spero (“Patent Owner”), hereby submits the following Updated Mandatory Notice to update the mailing address of Patent Owner’s counsel associated with the firm Brooks Kushman P.C. and to reflect petitions filed by Porsche Cars North America, Inc. and Mercedes-Benz USA, LLC. Patent Owner reserves its rights to supplement or modify these Notices.

**A. Real Party-In-Interest (37 C.F.R. § 42.8(b)(1)) – Unchanged**

**B. Related Matters - 37 C.F.R. § 42.8(b)(2)**

Patent Owner identifies the following related current and/or former proceedings involving the patent-at-issue:

1. *Torchlight Techs. LLC v. Daimler AG et al.*, Civil No. 1:22-cv-00751 (D. Del.), filed June 7, 2022. Petitioner, Volkswagen Group of America, Inc., was voluntarily dismissed without prejudice from this civil action on September 23, 2022 (pending).
2. *Torchlight Techs. LLC v. General Motors LLC et al.*, Civil No. 1:22-cv-00752 (D.Del.), filed June 7, 2022 (pending).
3. U.S. Reissue Application 16/858,342 (Reissue of U.S. Patent 9,955,551, pending).

4. *Ex Parte* Reexamination 90/,014,815 (Reexamination of U.S. Patent U.S. Patent 9,955,551, concluded).
5. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00318 (IPR of U.S. Patent 9,955,551, pending).
6. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00336 (IPR of U.S. Patent 9,955,551, institution denied).
7. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01039 (IPR of U.S. Patent 9,955,551, pending).
8. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01040 (IPR of U.S. Patent 9,955,551, pending).
9. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01225 (IPR of U.S. Patent 9,955,551, pending).
10. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-01296 (IPR of U.S. Patent 9,955,551, pending).

Patents in the same patent family as the '551 patent have been subject to multiple patent office proceedings:

1. *Unified Patents v. Torchlight Technologies LLC*, IPR2022-01500 (IPR of U.S. Patent 11,208,029, settled).
2. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2022-01586 (IPR of U.S. Patent 11,208,029, pending).
3. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01034 (IPR of U.S. Patent 11,208,029, pending).
4. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-01122 (IPR of U.S. Patent 11,208,029, pending).
5. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01126 (IPR of U.S. Patent 11,208,029, pending).
6. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00197 (IPR of U.S. Patent 10,894,503, pending).
7. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00328 (IPR of U.S. Patent 10,894,503, pending).
8. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00335 (IPR of U.S. Patent 10,894,503, pending).
9. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01026 (IPR of U.S. Patent 10,894,503, pending).

10. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01027

(IPR of U.S. Patent 10,894,503, pending).

11. *Mercedes-Benz USA LLC v. Yechezkal Evan Spero*, IPR2023-01231

(IPR of U.S. Patent 10,894,503, pending).

12. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-

01320 (IPR of U.S. Patent 10,894,503, pending).

13. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-

01321 (IPR of U.S. Patent 10,894,503, pending).

**C. Lead and Back-Up Counsel - 37 C.F.R. § 42.8(b)(3) –  
Lead and Back-Up Counsel remain unchanged however,  
mailing address is updated as follows:**

| Lead Counsel                                                                                                                                                                                                                                              | Back-Up Counsel                                                                                                                                                                                                                                                                                                                                                              |
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**D. Service Information - 37 C.F.R. § 42.8(b)(4) -  
Unchanged**

Respectfully submitted,

Dated: January 3, 2024

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**Certificate of Service**

The undersigned hereby certifies that on January 3, 2024, a complete and entire copy of **Updated Patent Owner's Mandatory Notice** was served via electronic mail by serving the correspondence email address of record as follows:

| LEAD COUNSEL                                                                                                                                                                                                                             | BACK-UP COUNSEL                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
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