

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.
Petitioners,

v.

MEETRIX IP, LLC,
Patent Owner.

Case IPR2023-00379
U.S. Patent No. 9,094,525
(Claims 9-20)

PETITIONS' REPLY TO PATENT OWNER RESPONSE

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<i>In re Merck & Co., Inc.</i> , 800 F. 2d 1091 (Fed. Cir. 1986)	3, 7
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TABLE OF EXHIBITS

Ex.	Description
1001	U.S. Patent No. 9,094,525 (“the ’525 patent”)
1002	Patent Assignments for the ’525 patent
1003	Declaration of Dr. Henry H. Houh
1004	<i>Curriculum Vitae</i> for Dr. Henry H. Houh
1005	File History of Application No. 13/674,233 (the ’233 application)
1006	U.S. Patent No. 7,180,997 (“Knappe”)
1007	U.S. Patent No. 6,690,654 (“Elliott”)
1008	U.S. Patent No. 7,089,285 (“Drell”)
1010	Guichard <i>et al.</i> , “MPLS and VPN Architectures, A practical guide to understanding, designing and deploying MPLS and MPLS-enabled VPNs,” Cisco Press, 2001 (“VPN Textbook”)
1011	Declaration of Ingrid Hsieh-Yee, Ph.D., under 37 C.F.R. § 1.68
1012	U.S. Patent No. 3,060,265
1013	U.S. Patent No. 4,139,731
1014	U.S. Patent No. 3,601,530
1015	U.S. Patent No. 4,796,293
1016	A Primer on the T.120 Series Standard
1017	T.120 Standard (1996)
1018	U.S. Patent No. 6,237,025
1019	U.S. Patent No. 6,782,413
1020	U.S. Patent No. 6,980,526

Ex.	Description
1021	Caputo, “Cisco Packetized Voice & Data Integration,” McGraw-Hill, 2000
1022	De Moraes <i>et al.</i> , “The Internet Multicast from ITS: How it was Done and Implications for the Future,” IEEE Communications Magazine, January 1995
1023	U.S. Patent Publication No. 2004/0261116 A1
1024	U.S. Patent No. 6,850,496
1025	U.S. Patent No. 6,553,515
1026	U.S. Patent No. 6,633,848
1027	Computer Desktop Encyclopedia
1031	RFC 2401
1038	Citrix Claim Construction Order
1046	Declaration of C.J. Alice Chuang

I. INTRODUCTION

The Patent Owner Response (“POR”) fails to rebut the Petition or the Board’s preliminary findings that the challenged claims are unpatentable. Instead, the POR provides unsupported and conclusory attorney argument that largely fails to follow the legally appropriate approach to rebut the obviousness evidence presented in the Petition. The attorney arguments in the POR attempt to rebut obviousness by challenging prior art references individually instead of the presented combination, mischaracterizing the teachings of the prior art. The arguments also lack support from or citations to the record.

II. THE BOARD SHOULD DISREGARD PATENT OWNER’S IRRELEVANT ARGUMENT REGARDING THE LEVEL OF ORDINARY SKILL IN THE ART AND CLAIM CONSTRUCTION

In the POR, Patent Owner disagrees with Petitioners that a person of ordinary skill in the art (“POSITA”) would have at least three years of experience relating to conferencing systems in packet-based networks, claiming the requirement is “too specialized.” POR at 11-12. Patent Owner instead contends that a POSITA relevant to the ’525 patent would have **no** relevant experience in the field of the alleged invention but only generic experience in “computer systems development.” *Id.* at 12. The ’525 patent, however, specifically notes that the invention “relates to computer system architectures, and **more particularly to audio and video telecommunications for collaboration over hybrid networks.**”

Ex_1001 at 1:18-20 (emphasis added). A POSITA's credentials should at least include experience in the field of the invention as recited by the patent.

Not only is Patent Owner's proposal clearly wrong but any alleged dispute over the level of ordinary skill in the art is actually irrelevant since none of the arguments in the POR turn on the disagreement over a POSITA's experience level. While having a few years of work experience in the actual field of the invention is not "too specialized" a requirement for a POSITA, under either definition the result is the same: the challenged claims are unpatentable.

The Patent Owner also disagrees with Petitioners' assertion that, for purposes of this Petition, "no claim term requires express construction for the Board to evaluate the patentability of the claims." POR at 12. The POR then proceeds to list 13 claim terms with corresponding constructions adopted by a District Court in a litigation with another party. *Id.* at 12-13. But the subsequent Patent Owner arguments do not actually rely on any of these claim constructions or suggest that Petitioners' arguments are inconsistent with any of these constructions. Thus, this disagreement is also irrelevant. The application of the prior art references in the Petition to the actual claim language of the challenged claims does not require any of these constructions nor is it at odds with them. Under the plain and ordinary meaning of the claim terms, the challenged claims are unpatentable.

III. RESPONSE TO PATENT OWNER ARGUMENTS

In response to the Petitioners' grounds of rejection and the Board's institution decision, the POR either sets forth irrelevant arguments or relies on unsupported attorney argument with few citations to the record and virtually no evidentiary support, from the inventor declaration or otherwise. It is well established that "[a]rgument in the brief does not take the place of evidence in the record." *In re Schulze*, 346 F.2d 600, 602, (CCPA 1965). Further, the attorney argument challenging the obviousness rejections is largely based on improperly "attacking references individually where the rejection is based upon the teachings of a combination of references." *In re Merck & Co., Inc.*, 800 F. 2d 1091, 1097 (Fed. Cir. 1986). Thus, the Patent Owner's arguments fail to overcome the Board's findings that claims 9-20 are unpatentable.

A. The Argument in Section III.A of the POR Is Irrelevant

Section III.A of the POR argues that a POSITA would not have been motivated to combine Knappe and Elliott with respect to Elliott's teachings on use of VPNs. POR at 16-17. The Petition, however, relies on Drell (not Knappe) as the primary reference in combination with Elliott and Knappe. *See e.g.* Pet. at 4, 13. Thus, arguments about the motivation to combine Knappe and Elliott are irrelevant.

Moreover, for claims 9-12 and 15-18, Petitioners rely on Drell (not Knappe) in combination with Elliott's teachings with respect to the use of collaboration data, which have nothing to do with Elliott's teachings on the use of VPN. *See e.g.* Pet. at 46 and Ex_1003 ¶¶304-310. Thus, the POR's arguments regarding the combination of Knappe and Elliott with respect to use of VPNs have no bearing on the obviousness of claims 9-12 and 15-18 of the '525 patent for this additional reason. And in any event, Petitioners' expert, Dr. Houh, explains why a POSITA would have been motivated to combine Elliott's teachings regarding the use of collaboration data in Drell's system. *See e.g.* Pet. at 46 and Ex_1003 ¶¶304-310.

Only claims 13-14 and 19-20 of the '525 patent have any limitations relating to VPNs. And as noted above, for those claims (as well as all other claims addressed by the Petition), Petitioners rely on Drell (not Knappe) as the primary reference in combination with Elliott's teachings regarding VPNs and IP-tunneling. Thus, for those claims as well, the POR's arguments about the motivation to combine Knappe and Elliott have no application. Thus, while Petitioners disagree with the assertion that a POSITA would not be motivated to combine Knappe with Elliot, they need not address the argument given that the Petition does not rely on Knappe in combination with Elliott as a grounds for obviousness.

B. The Prior Art Renders Obvious the “Mixing” Limitation of Claim 9

Section III.B of the POR argues that neither Knappe nor Drell disclose limitation [9.6], which requires “mixing the audio data received form the telephone with the audio data received form the local audio input device and the video received from the local video input device into mixed audio-video data.” POR at 18-19. The POR first contends that a POSITA would not have been motivated to combine Drell and Knappe because Knappe discloses use of a centralized conference bridge and call manager to perform encoding, mixing, and transmission of data, while Drell teaches use of a local application that mixes data from all participants. *Id.* at 18. The POR offers nothing more than conclusory argument and citation to as single paragraph in the named inventor’s declaration. *Id.*, citing Ex_2001 ¶ 21. That cited paragraph does not, however, even address whether a POSITA would be motivated to combine Drell and Knappe. Ex_2001 ¶ 21¹. Instead, cited paragraphs 21 of Ex_2001 (Dye Decl.) discusses virtual private networks (VPNs) and whether a POSITA would be motivated to combine a different reference – Elliott (Ex_1007) – with Knappe and Drell. Claim 9 of the ’525 patent does not, however, recite any VPN limitations. Nor do Petitioners rely

¹ The inventor declaration (Ex_2001) does include a single conclusory statement that a POSITA would not combine Drell and Knappe, but fails to set forth any explanation or basis beyond the mere conclusion. *See* Ex_2001 ¶ 20.

on Elliott's VPN teachings to show the obviousness of claim 9. Thus, POR's evidence is not relevant to claim 9.

Without any relevant evidentiary citation, the POR offers nothing more than attorney argument to support its claims that a POSITA would not be motivated to combine Drell and Knappe. In contrast, the Petition (supported by the testimony of Petitioners' independent expert (Ex_1003)) offers more than substantial evidence that a POSITA in the art would have been motivated to combine Drell with Knappe. For example (and specifically relevant to the "mixing" limitation of claim 9), Petitioners explained and provided evidence regarding Drell's disclosure of "audio mixing module 308" and "video switching/continuous presence module 306" that combines audio and video data received from remote conference endpoints with locally generated data. Pet. at 35-36; Ex_1008 at 5:8-30; Ex_1003 ¶¶ 429-432. Drell further disclosed the generating "separate processing trains for signal streams from/to each of the remote conference endpoints." Ex_1008 at 2:19-21; Ex_1003 ¶ 438. Knappe supplements these disclosures and teaches mixing and outputting streams that "includes the media of all other participants, a subset of other participants, or other suitable mix dictated by the type of multiparty session and/or the participant." Pet. at 38, Ex_1006 at 5:35-39; Ex_1003 ¶¶ 437-439. Dr. Houh explained that a POSITA in the art would have understood such teachings in Knappe would complement and further Drell's goals. Pet. at 38;

Ex_1003 ¶ 440. Indeed, Petitioners and Dr. Houh detailed numerous reasons why a POSITA would have been motivated to combine Drell and Knappe, none of which Patent Owner addresses in the POR. *See* Pet. at 38, citing Ex_1003 ¶¶ 148-168. Thus, for the reasons stated in the Petition, a POSITA in the art would have been motivated to combine Drell with Knappe.

Therefore, the POR's remaining arguments that the disclosures in Drell and Knappe separately do not disclose limitation [9.3] are irrelevant. Petitioners' ground for obviousness is based on Drell in combination with Knappe, and it is improper to consider their teachings in isolation. *See In re Merck*, 800 F. 2d at 1097 (finding it improper to attack references individually where the rejection is based upon the teachings of a combination of references)

C. The Prior Art Renders Obvious the “Transmitting” Limitation of Claim 9 and the “First Mixer” Limitation of Claim 17

In Sections III.C and III.J, the POR contends that Knappe and Drell do not disclose either the “transmitting” limitation of claim 9 (limitation [9.7]) or the “first mixer” limitation of claim 17 (limitation [17.3]) because the limitation requires transmitting the mixed audio data from the telephone and local input device only to the first and second remote computer, while Knappe discloses transmitting mixed data from the first remote computer, the telephone, and local input device to the second remote computer. POR at 19-20, 25. The POR's argument is unsupported and nonsensical.

As a preliminary matter, neither Section III.C nor Section III.J of the POR includes any citations to the record and consists of only unsubstantiated attorney argument. Moreover, the argument mischaracterizes Knappe's teachings. For example, the POR states that Knappe transmits data from a first remote computer, the telephone and a local input device, but Knappe uses a centralized conference bridge and call manager; there is no "local" device. *See e.g.* Ex_1006, FIG. 1; Ex_1003 ¶137. Knappe also teaches limiting the number of participants' audio streams that are mixed together. *See* Ex_1005 at 7:12-17, 9:15-30; Ex_1003 ¶¶437-439.

More importantly, regardless of Knappe's disclosures, the POR makes the illogical leap that because Knappe does not contain certain disclosures (which is not true), "Knappe and Dell, even in combination" lack the necessary disclosures. That conclusion does not logically follow and the POR cannot draw such a conclusion, particularly without even addressing the teachings and disclosures in Drell and how they would be understood in light of Knappe by a POSITA. Thus, Patent Owner's arguments do not rebut Petitioners' showing of obviousness.

D. The Prior Art Renders Obvious the "VPN" Limitations of Claims 13 and 14.

Claims 13 and 14 of the '525 patent require transmitting data through a VPN. Sections III.D. and III.E of the POR contend that the combination of Drell and Knappe do not disclose the VPN limitation, arguing that Elliott's use of VPN

“pertains solely to isolated one-to-one interactions” and would not apply to a multipoint conferencing system like Drell’s. POR at 20-21. First, the POR is incorrect in its description of Elliott’s teachings. Elliott does not pertain “solely to isolated one-to-one interactions.” Indeed, Elliott explicitly states that its system “also enables services for one-to-many and many-to-many IP-based collaboration[.]” Ex_1007 at 2:10-13; *see also id.* at 7:58-61 (discussing “multiple 1:1, 1:n, n:1, and n:n sessions”). Thus, the POR bases its argument on a false premise.

Moreover, as detailed by Petitioners’ expert, it would have been obvious to a POSITA that a system like Drell’s would benefit from Elliott’s use of VPNs to provide security for conferencing communications for business over the Internet. Ex_1003 ¶311; Ex_1008 at 1:20-25. Dr. Houh explained that it was well known that data transmitted over public IP networks are vulnerable to security issues and that use of VPNs was a way to protect such communications. Ex_1003 ¶ 311. Indeed, at the time, skilled artisans were already combining VPNs with conferencing systems. *Id.* ¶ 312, citing Ex_1020 at 2:65-3:3, 5:52-55 and Ex_1019 at 4:23-27, 6:36-41. Thus, as set forth in the Petition, it would have been obvious to a POSITA to use a VPN in Drell’s system when communicating audio, video, and collaboration data to provide the system with secure communications. Pet. at 53, citing Ex_1003 ¶¶ 303-317, 520; *see also* Ex_1003 ¶¶516-526.

E. The Prior Art Renders Obvious the “Encoding” Limitations of Claims 15 and 16

Sections III.F and III.G of the POR argues that the prior art does not teach or suggest the “encoding” limitations of claims 15 and 16. The POR contends that the prior art does render obvious “encoding” because it does not teach or suggest the “transmitting” limitation of claim 9, which is discussed above in Section III.C of this Reply. Accordingly, this argument fails for the same reasons discussed in above in Section III.C. of this Reply.

The POR also reiterates its arguments that a POSITA would not be motivated to combine Drell and Knappe. This argument fails for the same reasons set forth above, in Section III.B. of this reply. Indeed, the Petition detailed a POSITA’s motivation to combine Drell and Knappe, including based on their teachings with respect to encoding mixed data (as recited in the “encoding” limitation of claim 15). *See* Pet. at 19-20, citing Ex_1003 ¶¶161-164. Specifically, Drell teaches the use of codecs to encode data before transmission over the Internet and Knappe supplements that teaching with disclosures about encapsulation of VoIP packets before transmission over the Internet. Pet. at 19-20, citing Ex_1008 at 6:33-45, 3:33-34 and Ex_1006 at 3:50-58; *see also* Ex_1003 ¶¶161-162. Thus, a POSITA would have been motivated to combine these references as Knappe’s teachings would be well suited for the packet processing disclosed in Drell. Pet. at 20, citing Ex_1003 ¶¶163-164.

**F. The Prior Art Renders Obvious the “Voice Over IP Decoder”
Limitation of Claim 17**

With respect to the “voice over IP decoder” limitation of claim 17, the POR once again argues that a POSITA would not have been motivated to combine Drell and Knappe. This argument fails for the same reasons discussed above in Sections III.B and III.E of this Reply. *See also* Ex_1003 ¶¶148-168 (detailing reasons to combine Drell and Knappe).

Moreover, the POR ignores the evidence of record demonstrating how the prior art renders obvious the “voice over IP decoder” limitation. Drell explicitly teaches that audio codec 408 receives an audio data stream . . . [and] decod[es] in accordance with a standard or proprietary audio compression algorithm.” Pet. at 60, citing Ex_1008 at 6:18-23 and Ex_1003 ¶¶ 277-279, 498. Indeed, Drell teaches that its communication process includes a “H.323 (packet-based) process,” which is a well-known standard that specifies encoding and decoding VoIP communications. Pet. at 60, citing Ex_1008 at 2:17-33 and Ex_1003 ¶¶ 280-281, 500-501. The POR also fails to address Petitioners’ reliance on Knappe’s disclosure of a “codec (coder/decoder)” for processing “IP packets such as VoIP packets . . . encapsulated in real-time transport protocol packets.” Pet. at 60, citing Ex_1006 at 4:9-14, 3:50-57. Thus, the “voice over IP decoder” of claim 17 is rendered obvious by the combination of Drell and Knappe. Pet. at 60-61; Ex_1003 ¶¶ 269-285, 553-555.

G. The Prior Art Renders Obvious the “Voice Over IP Encoder Configured to Compress Audio Data” Limitation of Claim 17

Section III.I of the POR argues that a POSITA would not have been motivated to modify Drell’s VoIP encoder with Knappe’s compression because VoIP encoding and compression are two different processes. POR at 24. The POR presents no evidentiary support (either in the form of an expert declaration or otherwise) to support this position.

Moreover, this argument is directly at odds with the disclosures in Drell. The Petition specifically noted that Drell teaches that “audio code 408 encodes the audio data stream . . . using a standard or proprietary audio *compression algorithm*.” Pet. at 41, citing Ex_1008 at 6:33-45 (emphasis added); *see also* Pet. at 41; *see also id.* at 61 (referring back to discussion of limitation [9.9] in connection with the “voice over IP encoder” limitation of claim 17). Thus, contrary to the POR’s assertion, Drell teaches encoding data using a compression algorithm. Pet. at 42; Ex_1003 ¶¶455-460, 557. The Petition further explains how the audio codec 408 of Drell discloses a voice IP encoder, noting that Drell explains the codec process comprises an “H.323 process” which is a well-known standard for encoding and decoding VoIP communications. Pet. at 61, citing Ex_1008 at 2:26-28 and Ex_1003 ¶¶339-349, 559-560.

H. The Prior Art Renders Obvious the “Second Mixer” Limitation of Claim 17

In Section III.K, the POR contends that Drell and Knappe cannot be combined to render obvious the use of a near conference endpoint to act as moderator. POR at 26. Specifically, the POR contends that a POSITA would not be motivated to designate one of Drell’s participant as a moderator as taught in Knappe because it is less efficient to use Knappe’s centralized call manager to mix and encode data, instead of a local conferencing application as taught in Drell. *Id.* at 26. As a preliminary matter, the POR offers no evidentiary support for this claim and the argument should thus be given little consideration.

More importantly, the argument misunderstands the patent claim and the prior art. First, nothing in the ’525 patent requires the claimed “moderator” to control the mixing and encoding of data. Thus, Drell’s implementation of a moderator like in Knappe would not require implementing a centralized call manager for mixing and encoding. Second, as explained in the Petition, Knappe teaches that at least one conference participant can be designated as a moderator to control the flow of the conference. Pet. at 17, citing Ex_1006 at 8:52-56; Ex_1003 ¶¶150-151. Thus, as set forth in the Petition, it would have been obvious to a POSITA that one of the participants in the Drell system, such as near conference endpoint 100 or remote conference endpoint 104, could also be designated as a moderator because that would allow the user to initiate, organize, control, and

influence the conference. Pet. at 17, citing Ex_1003 ¶¶151-152. The combination of Drell and Knappe to implement near conference endpoint 100 as a moderator in the Drell system is thus the ordinary use of a common technique (designating a participant as a moderator) to yield the predictable result of initiating, organizing, and controlling a conference. *Id.* The POR offers no evidence to rebut this showing.

I. The Prior Art Renders Obvious the “Third Mixer” Limitation of Claim 18

Section III.L of the POR argues that the prior art does not disclose the additional limitation of claim 18. The POR contends that Knappe and Elliott cannot be combined. POR at 26. But as noted above, Petitioners grounds for obviousness is based on the combination of Drell with Knappe, not Knappe with Elliott. *See* Section III.A of Reply, above. Thus, this argument has no relevance to the Petition and need not be addressed.

Moreover, Petitioners explained and provided evidence regarding Drell’s disclosure of “audio mixing module 308” and “video switching/continuous presence module 306” that combine audio and video data received from remote conference endpoints with locally generated data. Pet. at 35-36; Ex_1008 at 5:8-30; Ex_1003 ¶¶ 429-432. Drell further disclosed the generating “separate processing trains for signal streams from/to each of the remote conference

endpoints.” Ex_1008 at 2:19-21; Ex_1003 ¶ 438. Thus, contrary to Patent Owner’s assertion, the prior art does disclose separate mixers.

J. The Prior Art Renders Obvious the “Virtual Private Network (VPN) Tunnel” Limitation of Claims 19 and 20

Sections III.M and III.N of the POR repeat the same argument – using almost identical language – that the prior art does not disclose the “VPN tunnel” limitation of the claims 19 and 20. POR at 27-35. The POR ignores most of the evidence and prior art relied upon by Petitioners and instead asserts a series of irrelevant, incorrect and disjointed arguments (most of which are not supported by any evidence in the record). *Id.*

The POR first contends, “Petitioner has broken the complete claim element into two parts. The element is ‘receiving first audio data, first video data and first collaboration data at a server from a first remote client through a first Virtual Private Network (VPN) tunnel.’” *Id.* at 28, 32. But there is no such claim language in claims 19 or 20 (or any of claims 9-20) of the ’525 patent. Thus, the argument appears to have been inadvertently included in the POR and has no relevance here.

The POR goes on to argue (with no evidentiary support), that the VPN and VPN tunnel referenced in Elliot “can only be understood as directed to ‘network 18,’ which is used to connect two computers over the Internet, and not audio data, mixed or otherwise.” *Id.* at 28-29, 32-33. Attorney argument carries no

evidentiary weight. *In re Schulze*, 346 F.2d at 602. In any event, the POR's characterization of Elliott is incorrect. Elliott expressly discloses securing the transmission of audio data with VPN tunnels. Elliott teaches "multi-media collocation" including "voice, fax, data, video, etc." transmitted over the Internet using a "virtual private network (VPN). . . which uses IP or IP-tunneling." Ex_1003 ¶¶313-314. The POR contends that Petitioners fail to distinguish between a VPN and a VPN tunnel (POR at 23), but as discussed above, Elliott explicitly discloses use of tunneling.

Next, the POR asserts that the "VPN tunnel" limitations are not obvious because Elliott does not disclose a "VPN bridge" or a system wherein data is delivered via a VPN tunnel to a moderator where the data is "decrypted" before being shared with the PSTN client. POR at 29, 33. But none of the claims of the '525 patent (including claims 19 and 20) requires a "VPN bridge" or decryption of any data.

The POR includes one sentence regarding the construction of "VPN" as "a private network of securely connected appliances configured within a public network", claiming that is not shown by the prior art. POR at 30, 33-34. That is certainly not the case. As explained above (and in the Petition), Elliott expressly discloses a VPN and use of IP-tunneling. Pet. at 53, 55, citing Ex_1007 at 2:66-3:13, 4:6-12, 4:31-34 and Ex_1003 ¶¶ 518-520, 536.

In addition, the POR ignores all the prior art and evidence relied on by Petitioners. Dr. Houh explained that before the '525 patent's priority date, implementing VPN tunnels was well-known. He explained that "[t]unneling refers to a networking technique whereby a packet is encapsulated in another network packet, typically so that it can traverse an underlying network that does not support the capability required by the encapsulated packet." Ex_1003 ¶ 99. He explained that such encapsulated IP tunneling was standardized and "described in RFC 1853 which was published in the mid-1990s." *Id.*

The POR does not even address, let alone rebut Petitioners' reliance on this evidence showing the obviousness of the "VPN tunnel" limitations.

Given that none of the arguments raised by Patent Owner in the POR successfully rebut any of Petitioners' arguments as to claims 9, 13-20 of the '525 patent (the only claims addressed in the POR), or the Board's initial determinations as to these claims, all of the challenged claims 9-20, should be finally deemed unpatentable.

IV. CONCLUSION

For the reasons given above and in the Petition, Petitioners have demonstrated a reasonable likelihood of success in establishing the unpatentability

of claims 9-20 of the '525 patent and respectfully requests cancellation of claims 9-20.

Respectfully submitted,

Date: January 12, 2024

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CERTIFICATE OF WORD COUNT PURSUANT TO 37 C.F.R. § 42.24(D)

The undersigned hereby certifies that the word count for the above Reply is 3,954, which is less than the 5,600 allowed under 37 CFR § 42.24(c)(1).

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 12, 2024, a copy of this PETITIONERS' REPLY TO PATENT OWNER RESPONSE and all supporting exhibits were provided via electronic mail (by consent) to the Patent Owner by serving the correspondence address identified in the Mandatory Notices:

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