

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEOTAB USA, INC. AND GEOTAB, INC.,
Petitioners,

v.

OMEGA PATENTS, LLC,
Patent Owner.
U.S. Patent No. 8,032,278
Filing Date: June 3, 2007
Issue Date: October 4, 2011

Case No. IPR2023-00504

**PATENT OWNER'S SUR-REPLY TO
PETITIONERS' REPLY TO PATENT
OWNER'S PRELIMINARY RESPONSE AS
AUTHORIZED BY EXHIBIT 1114**

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Fed. R. Evid. § 807	2

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 8,032,278 to Flick (the '278 Patent)
1002	Prosecution File History of U.S. Patent No. 8,032,278
1003	Declaration of Jeffrey Miller, Ph.D.
1004	Curriculum Vitae of Jeffrey Miller, Ph.D.
1005	Prosecution History of Ser. No. 90/013,587 (RX1)
1006	Prosecution History of Ser. No. 90/013,851 (RX2)
1007	Prosecution History of Ser. No. 90/014,309 (RX3)
1008	Prosecution History of Ser. No. 90/014,419 (RX4)
1009	Prosecution History of Ser. No. 90/014,675 (RX5)
1010	Claim Rejection, mailed May 6, 2016 in No. 90/013,587 (RX1)
1011	Decision granting ex parte reexamination request, mailed December 15, 2016 in No. 90/013,851 (RX2)
1012	Ex parte Omega Patents, LLC, No. 2018-008119 (Nov. 3, 2018)
1013	Decision granting ex parte reexamination request, mailed March 25, 2021 in No. 90/014,675 (RX5)
1014	Non-Final Rejection, mailed October 5, 2021 in No. 90/014,675 (RX5)
1015	Patent Owner's Appeal Brief, No. 90/014,675 (April 1, 2022)
1016	Transcript of oral argument in Ex parte Omega Patents, LLC, No. 2022-003758, Reexamination No. 90/014,675 (Oct. 28, 2022)
1017	<i>Ex parte Omega Patents, LLC</i> , No. 2022-003758 (Nov. 30, 2022)

1018	D.I. 50, Claim Construction Order, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb. 20, 2015) (“ <i>CalAmp-CC</i> ”).
1019	D.I. 34, Claim Construction Order, <i>Omega Patents, LLC v. Firstech, LLC</i> , No. 2:20-cv-01344 (W.D. Wash. Nov. 22, 2021) (“ <i>Firstech-CC</i> ”).
1020	<i>Omega Patents, LLC v. CalAmp Corp.</i> , 920 F.3d 1337 (Fed. Cir. 2019) (“ <i>CalAmp-I</i> ”)
1021	<i>Omega Patents, LLC v. CalAmp Corp.</i> , 13 F.4th 1361 (Fed. Cir. 2021) (“ <i>CalAmp-II</i> ”)
1022	D.I. 14, Omega Patents Answering Brief In Opposition to Geotab USA, Inc.’s Motion to Dismiss, <i>Omega Patents, LLC v. Geotab USA, Inc. and Geotab, Inc.</i> , No. 1:22-cv-01044-CFC (D. Del. Nov. 16, 2022)
1023	U.S. Patent No. 6,957,133 (“ <i>Hunt</i> ”)
1024	U.S. Patent No. 6,756,885 (“ <i>Flick-885</i> ”)
1025	U.S. Patent No. 6,011,460 (“ <i>Flick-460</i> ”)
1026	D.I. 040, Omega Patents Opposition to CalAmp Motion For Claim Construction, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Oct. 3, 2014)
1027	D.I. 144, Jury Verdict, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Sep. 30, 2019)
1028	D.I. 310, Jury Verdict, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb. 24, 2016)
1029	D.I. 143, Jury Instructions, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Nov. 24, 2016)
1030	D.I. 309, Jury Instructions, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Sep. 30, 2019)
1031	Y. Park and A. Fumiyuki, eds. <i>Enhanced Radio Access Technologies For Next Generation Mobile Communication</i> . Dordrecht: Springer, 2007.
1032	F. Delli Priscoli and M. Neri, “Integration of the ORBCOMM satellite network with the GSM Short Message Service.” <i>Space Communications</i> , Vol. 19, no. 1, pp. 47-57, 2003.
1033	D.I. 180, Transcript, Civil Jury Trial–Day 3, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb. 18, 2016)
1034	Pages from D.I. 181, Transcript, Civil Jury Trial–Day 4, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb. 19, 2016)

1035	<i>RESERVED</i>
1036	<i>RESERVED</i>
1037	<i>RESERVED</i>
1038	<i>RESERVED</i>
1039	Pages from D.I. 338, Transcript, Civil Jury Trial–Day 2, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Sep. 24, 2019)
1040	Pages from D.I. 339, Transcript, Civil Jury Trial–Day 3, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Sep. 25, 2019)
1041	<i>RESERVED</i>
1042	<i>RESERVED</i>
1043	<i>RESERVED</i>
1044	Comparison of limitations in '278 patent claims 13-22 with limitations in '278 patent claims 1-12
1045	U.S. District Court – Judicial Caseload Profile for the District of Delaware, <i>available at</i> https://www.uscourts.gov/sites/default/files/fcms_na_distprofile0630.2022_0.pdf (last visited December 19, 2022)
1046	Title 40 Code of Federal Regulations, Part 86, Subpart S—General Compliance Provisions for Control of Air Pollution From New and In-Use Light Duty Vehicles, Light-Duty Trucks, and Complete Otto-Cycle Heavy-Duty Vehicles (July 1, 2007)
1047	SAE J1939-71 Vehicle Application Layer (rev. DEC2004)
1048	SAE J1708 Serial Data Communications Between Microcomputer Systems in Heavy-Duty Vehicle Applications (rev. AUG2004)
1049	<i>RESERVED</i>
1050	International Standard ISO 15031-4 Road Vehicles—Communication between vehicle and external equipment for emissions related diagnostics—Part 4: External test equipment (1st ed. June 15, 2005) (“ISO 15031-4:2005”)
1051	Pages from Microsoft Internet & Networking Dictionary (2003)
1052	SAE J1978 OBD-II Scan Tool – Equivalent to ISO/DIS 15031-4:

	December 14, 2001 (revised 2002-04)
1053	Pages from IEEE 100 The Authoritative Dictionary of IEEE Standard Terms (7th Ed. 2000)
1054	D.I. 265, Federal Circuit Mandate, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. July 1, 2019)
1055	D.I. 392, Order Dismissing With Prejudice, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. June 16, 2022)
1056	U.S. Patent No. 8,856,266 B2
1057	U.S. Patent Application Publication No. US 2005/0032511 A1
1058	U.S. Patent Application Publication No. US 2004/0138790 A1
1059	U.S. Patent No. 6,611,740 to Lowrey
1060	U.S. Patent No. 7,209,813
1061	<i>RESERVED</i>
1062	<i>RESERVED</i>
1063	<i>RESERVED</i>
1064	U.S. Patent No. 7,617,727
1065	D.I. 145-85, PL104, 4/15/2015 Expert Report of Joseph C. McAlexander, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1066	13 Cal. Code Reg. §1968.2 Malfunction and Diagnostic System Requirements—2004 and Subsequent Model-Year Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles and Engines (2004)
1067	February 19, 2007 Internet Archive capture of startech.com webpage on computer cables at https://web.archive.org/web/20070219050320/http://www.startech.com/Product/Category.aspx?WCID=7&WCLID=2&MLID=2&menu=1&from=more&c=US
1068	D.I. 145, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1069	<i>RESERVED</i>
1070	Control of Air Pollution From New Motor Vehicles and New Motor

	Vehicle Engines; Modification of Federal On-Board Diagnostic Regulations for: Light-Duty Vehicles, Light-Duty Trucks, Medium Duty Passenger Vehicles, Complete Heavy Duty Vehicles and Engines Intended for Use in Heavy Duty Vehicles Weighing 14,000 Pounds GVWR or Less; Extension of Acceptance of California OBD II Requirements, 68 Fed. Reg. 35792 (June 17, 2003)
1071	SAE J1850 Class B Data Communications Network Interface, Rev. 2001-05 (May 2001)
1072	ISO 15765-4:2005(E) Road vehicles – Diagnostics on Controller Area Networks (CAN) – Part 4: Requirements for emissions-related systems (1st ed. ISO January 15, 2005)
1073	ISO 15031-5:2006(E) Road vehicles — Communication between vehicle and external equipment for emissions-related diagnostics — Part 5: Emissions-related diagnostic services (ISO 1st ed. January 15, 2006)
1074	ISO 14230-4 Road vehicles — Diagnostic systems — Keyword Protocol 2000 —Part 4: Requirements for emission-related systems (ISO 1st ed. June 1, 2000)
1075	SAE J1979 (R) E/E Diagnostic Test Modes – Equivalent to ISO/DIS 15031-5:April 30, 2002 (April 2002)
1076	SAE J2178-1 Class B Data Communication Network Messages— Detailed Header Formats and Physical Address Assignments (reaffirmed July 2004).
1077	D.I. 10, Geotab USA, Inc.’s Opening Brief In Support Of Motion To Dismiss, <i>Omega Patents, LLC v. Geotab USA, Inc. and Geotab, Inc.</i> , No. 1:22-cv-01044 (D. Del. Nov. 2, 2022)
1078	SAE J2178-4 Class B Data Communication Network Messages— Message Definitions for Three Byte Headers (reaffirmed July 2004).
1079	Pages from Title 40 Code of Federal Regulations, Part 86, Subpart S— General Compliance Provisions for Control of Air Pollution From New and In-Use Light Duty Vehicles, Light-Duty Trucks, and Complete Otto-Cycle Heavy-Duty Vehicles (July 1, 2014)
1080	Pages from Collins English Dictionary (5th ed. 2000)
1081	Pages from Newton’s Telecom Dictionary (2005)
1082	ISO 14230-2 Road vehicles—Diagnostic systems—Keyword Protocol 2000 – Part 2: data link layer (1st ed. Mar. 15, 1999)
1083	<i>RESERVED</i>

1084	<i>RESERVED</i>
1085	<i>RESERVED</i>
1086	<i>RESERVED</i>
1087	<i>RESERVED</i>
1088	<i>RESERVED</i>
1089	<i>RESERVED</i>
1090	D.I. 145-80, PL99, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1091	D.I. 145-54, PL68, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1092	D.I. 145-53, PL67, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1093	D.I. 145-67, PL81, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1094	D.I. 145-42, PL45, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1095	D.I. 145-57, PL71, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1096	D.I. 145-68, PL82, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1097	D.I. 145-69, PL83, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1098	D.I. 145-70, PL84, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1099	D.I. 145-73, PL88, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1100	D.I. 145-74, PL90, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1101	D.I. 145-75, PL92, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1102	D.I. 145-76, PL93, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1103	D.I. 145-77, PL96, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)

1104	D.I. 145-79, PL98, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1105	D.I. 145-81, PL100, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. Feb 25, 2016)
1106	D.I. 145-83, PL102, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. Feb 25, 2016)
1107	D.I. 145-84, PL103, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. Feb 25, 2016)
1108	D.I. 145-88, PL141, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. Feb 25, 2016)
1109	D.I. 145-55, PL69, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1110	D.I. 145-71, PL85, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1111	D.I. 145-72, PL86, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1112	D.I. 145-82, PL101, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. Feb 25, 2016)
1113	D.I. 145-78, PL97, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
1114	Board E-Mail Authorizing Reply to Patent Owner’s Preliminary Response (May 15, 2023)
2001	U.S. Patent No. 6,636,790 to Lightner
2002	Declaration of Mr. Joseph C. McAlexander, III
2003	Curriculum Vitae of Mr. Joseph C. McAlexander, III
2004	D.I. 297-1, Deposition of Galin Chen, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2005	D.I. 297-4, Deposition of Peter Hergesheimer, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2006	D.I. 297-5, Deposition of Stephen Hall, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2007	D.I. 39, Defendant CalAmp Corp’s Opening Claim Construction Brief, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 5, 2014)
2008	Intent to issue Reexamination Certificate, mailed on April 14, 2023 in 90/014,675 (RX5)

2009	U.S. Patent No. 5,732,074 to Spaur et al.
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I. EX-2004 – EX-2006 SUPPORT SECONDARY CONSIDERATIONS

Patent Owner (“PO”) has advanced evidence that establishes secondary considerations. Paper 7, (“POPR”), 47-51. Petitioners now want to bring back witnesses adverse to PO—a decade after providing sworn testimony—for cross-examination of sworn testimony relied on by district courts, the Federal Circuit, and twice by the PTAB. Paper 8, 1.

A. Hearsay

Rather than substantively address the evidence of secondary considerations set forth by Ex-2004 – Ex-2006, Petitioners attempt to convince the PTAB to discard this evidence as hearsay. First, the declarations offered by both parties are technically hearsay, and neither witness has been subject to cross exam given that the filings are prior to a decision on institution.¹ If the PTAB should disregard hearsay, Petitioners’ own declaration is likewise inadmissible.

Second, the same evidence submitted by PO has been cited in a Federal Circuit decision (*Omega Patents, LLC v. CalAmp Corp.*, 13 F.4th 1361, 1378 (Fed. Cir. 2021)), Ex-1021, which the PTAB can rely upon. The transcripts themselves simply provide context. Additionally, the PTAB has twice relied on this evidence as a basis for continued patentability of the ‘278 Patent. POPR 47-51. In particular, Ex-2004

¹ *Bortell v. Eli Lilly & Co.*, 406 F. Supp. 2d 1, 8 (D.D.C. 2005) (though available for summary judgment, “a sworn declaration remains ‘technically hearsay.’”); *Echostar Communs. Corp. v. FCC*, 292 F.3d 749, 753 (D.D.C. 2002).

– Ex-2006 serve the basis of two PTAB decisions that determined the same claims at issue in the present proceeding are patentable based upon the same evidence of secondary considerations Petitioners now want to exclude. Ex-1012 and Ex-1017. The relevant testimony was given under oath by adverse witnesses with the same motives as Petitioners, namely the assertion of invalidity.² Even if Ex-2004 – Ex-2006 were hearsay, they are subject to the residual exception, as the testimony is supported by sufficient guarantees of trustworthiness, having been made under oath and relied on by courts and by the PTAB twice before (POPR 47-51). Nothing is more probative on the point of secondary considerations considering the witnesses had the same interests and motives as Petitioners (e.g. invalidity), while PO cannot obtain the same evidence through reasonable efforts. Fed. R. Evid. § 807.

Petitioners rely on the recent decision *Data Company Techs. V. Bright Data*, which was a final decision (rather than prior to institution) that was routine and therefore not binding authority on this Board. Paper 8, 1, citing *Data Company Techs. V. Bright Data*, IPR2022-00138 (May 16, 2023). Such opinions have little persuasive value in relation to other Board opinions in other cases, typically turning on the specific facts of the case.³ This case is easily distinguished, as both courts and

² See, Fed. R. Evid. § 804(b)(1).

³ See PTAB’s Designations for Opinions available at <https://www.uspto.gov/sites/default/files/documents/PTAB%20Designations%20for%20Opinions%201-12-2016.pdf>) and PTAB Standard Operating Procedure (SOP) 2, rev. 10.

the PTAB have relied on this evidence, supporting its reliability.

Even if Ex-2004 – Ex-2006 were excluded, the PTAB decisions relying thereon (Ex-1012, Ex-1017), the jury verdict form indicating a nexus, the Federal Circuit decisions, and the PTAB’s reliance on that evidence from the Decisions on Appeal are admissible. (FRE 201; FRE 803(8)). Petitioners do not challenge PO’s expert testimony and opinions, which further support secondary considerations.

B. Ex-2004 – Ex-2006 Provide Evidence of Copying

Petitioners contend that, even considering Ex-2004 – Ex-2006, there is no evidence of copying. Paper 8, 1. The PTAB has twice already concluded this is evidence of copying. POPR 48-50, citing Ex-1017 at 13-14. Petitioners argue that whatever relevance this evidence might have had in the third-party litigation is not relevant to secondary considerations here. Paper 8, 1-2. However, this evidence was clearly relevant to the PTAB in previous proceedings -- serving as the basis for twice upholding the patentability of the claims. Petitioners cite to *Wyers v. Master Lock*, 616 F.3d 1231, 1246 (Fed. Cir. 2010), noting that “[n]ot every competing product that arguably falls within the scope of a patent is evidence of copying; otherwise, every infringement suit would automatically confirm the nonobviousness of the patent.” Paper 8, 1-2. However, this is not an infringement suit, but instead a proceeding where the same secondary considerations evidence that has twice been considered by the PTAB in view of an array of different prior art, should be

considered just the same.

C. Ex-2004 – Ex-2006 Have A Nexus To The Claims

Petitioners argue that there is no nexus, but PO is entitled to presumption of a nexus. *Fox Factory, Inc. v. SRAM, LLC*, 944 F.3d 1366, 1373 (Fed. Cir. 2019). The PTAB already twice determined, based upon the same Ex-2004 – Ex-2006 evidence, there is a nexus. POPR 47-51; Ex-1012; and Ex-1017. Petitioners contend that the secondary considerations evidence “plainly rely on unclaimed features” and instead search for testimony to match the claim language verbatim, despite offering no authority that testimony must regurgitate the claim language. Paper 8, 2. Petitioners next contend that there is no nexus because the “PO plainly relies on features that were well known in the prior art” notably “multi-vehicle compatibility.” Paper 8, 2. This argument improperly characterizes the claim as “multi-vehicle compatibility,” disregarding the claimed functions of the recited controller that were deemed patentable time and again. See ‘278 *Patent*, claim 1, for example. The PO credits the PTAB with consideration of the claim recitations as they relate to the testimony in question and the prior art when they *twice* determined there “was a nexus”. POPR 47-51, citing Ex-1017 at 13-14.

II. HUNT

Petitioners contend that PO conceded that the issue of whether “enabling data” imparts patentable weight was never raised in previous proceedings. Paper 8, 4. This

is incorrect. PO indicated that the printed matter doctrine was never raised. POPR, 27. The issue of “enabling data” imparting patentable weight was considered, and the PTAB gave clear guidance on its construction. POPR 25-26.

Petitioners continue to rely on disjointed segments of *Hunt* (primarily boilerplate), and again mischaracterize PO’s arguments. Paper 8, 4-5. Simply put, *Hunt* discloses fixed protocols for selection via its ASIC. POPR 13-20. At the time of invention, a POSA could not simply reprogram an ASIC. POPR 13 citing *McAlexander* ¶56. The *Hunt* microprocessor determines one of the fixed protocols, communicates with the ASIC, and formats outgoing diagnostic communications for wireless network compatibility. POPR 19-20. The firmware of *Hunt* provides the microprocessor with its basic operations. *Id.* *Hunt* does not have the claimed downloading interface and fails to disclose all the claim elements within its four corners, and as arranged in the claim, leaving the POSA guessing. POPR 17-19. The boilerplate language relied on by Petitioner is noise that does fill the above-noted voids. POPR 20-23.

Dated: May 30, 2023	Respectfully submitted, <u>/s/ Ryan T. Santurri</u> Lead Counsel Ryan T. Santurri, Reg No. 61,894 rsanturri@allendyer.com Allen, Dyer, Doppelt + Gilchrist, P.A. 255 South Orange Avenue, Suite 1401 Post Office Box 3791 Orlando, Florida 32801-3791 Telephone: 407-841-2330 Facsimile: 407-841-2343
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being served on
May 30, 2023, by electronic mail at the following email addresses of record for the
Petitioners:

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Dated: May 30, 2023

Respectfully submitted,

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