

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIGHTRICKS LTD.,
Petitioner,

v.

PLOTAGRAPH, INC. and SASCHA CONNELLY,
Patent Owners

IPR2023-00568
Patent No. 11,182,641

PATENT OWNER’S UPDATED MANDATORY NOTICES

Pursuant to 37 C.F.R. §42.8(a)(2) Patent Owners Plotagraph, Inc. and Sascha Connelly (“Patent Owner”) hereby submit the following Mandatory Notices in response to the Petition for *Inter Partes* Review of U.S. Patent No. 11,182,641.

I. Real Parties in Interest

The real parties-in-interest for Patent Owner are as follows:

Plotagraph, Inc. – Patent Owner

Sascha Connelly – Patent Owner

II. Related Matters

A. Litigation Matters

Related matters to this proceeding are *Plotagraph, Inc. v. Lightricks Ltd.*, No. 4:21-cv-03873 (S.D. Tex. 2022) and *Plotagraph, Inc. v. Lightricks, Ltd.*, No. 23-1048 (Fed. Cir. 2022), dismissal affirmed in *Plotagraph, Inc. v. Lightricks, Ltd.*, Case No. 23-1048 (Jan. 22, 2024). Petition for Writ of Certiorari at U.S. Supreme Court docketed Sept. 19, 2024 as *Plotagraph, Inc. v. Lightricks, Ltd.*, Case No. 24-312.

B. Patent Office Matters

The following U.S. patents are related to U.S. Patent No. 11,182,641 and are being challenged with Petitions for *Inter Partes* Review:

U.S. Patent No. 10,558,342 – challenged in IPR2023-00152, Institution Denied

U.S. Patent No. 10,346,017 -- challenged in IPR2023-00153

U.S. Patent No. 10,621,469 -- challenged in IPR2023-00154

U.S. Patent No. 11,301,119 – challenged in IPR2023-00569, Institution Denied

III. Lead and Backup Counsel

Patent Owner has designated the following counsel:

Lead Counsel: Shawn Hunter (Reg. No. 36,168)
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IV. Service Information

Patent Owner may be served through their counsel identified above. Patent Owner consents to electronic service in this proceeding.

Dated: September 23, 2024

Respectfully submitted,

/Shawn Hunter/
Shawn Hunter
Reg. No. 36,168
Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e) the undersigned certifies that on September 23 2024, the foregoing Patent Owner's Updated Mandatory Notices was served via electronic mail upon the following counsel of record for the Petitioner:

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