

By: Joseph P. Staley (j.staley@pkhip.com)
Jason M. Perilla (j.perilla@pkhip.com)
PERILLA KNOX & HILDEBRANDT LLP
44 Milton Ave., Suite 144
Alpharetta, Georgia 30009
Tel: (470) 890-0132
Fax: (877) 389-6779

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DYNATEMP INTERNATIONAL, INC. and
FLUOROFUSION SPECIALTY CHEMICALS, INC.,
Petitioner,

v.

R 421A LLC,
Patent Owner.

Case No. IPR2023-00619
U.S. Patent No. 11,345,840

PATENT OWNER'S PRELIMINARY RESPONSE

PRELIMINARY RESPONSE

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.107, Patent Owner, R 421A LLC, respectfully submits the following Preliminary Response. R 421A LLC has filed a statutory disclaimer, disclaiming claims 1-12 of U.S. Patent No. 11,345,840 (the '840 Patent) on June 28, 2023, in accordance with 35 U.S.C. § 253. Therefore, all of the claims challenged in this *inter partes* review are no longer at issue. “No *inter partes* review will be instituted based on disclaimed claims.” 37 C.F.R. § 42.107. The review should not be instituted.

II. CONCLUSION

R 421A LLC believes this Preliminary Response provides good reason why the *inter partes* review should not be instituted. All bases of the review requested are no longer at issue. In the interest of judicial efficiency, and the efficiency of the parties, R 421A LLC respectfully believes the *inter partes* review should not be instituted.

Dated: June 28, 2023

Respectfully submitted,

/Joseph P. Staley/

Joseph P. Staley (Reg. No. 60,732)
Lead Counsel for Patent Owner

Perilla Knox & Hildebrandt LLP
44 Milton Ave., Suite 144
Alpharetta, GA 30009
Tel: (470) 890-0132
Fax: (877) 389-6779

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Patent Owner's Preliminary Response, excluding the portions exempted under 37 C.F.R. § 42.24(b), contains 145 words according to Microsoft Word.

Dated: June 28, 2023

Respectfully submitted,

/Joseph P. Staley/

Joseph P. Staley (Reg. No. 60,732)
Lead Counsel for Patent Owner

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CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 28nd day of June, 2023, a complete and entire copy of the foregoing Patent Owner's Preliminary Response was served on counsel of record for Petitioners, as follows:

Lead Counsel	Backup Counsel
Jon R. Trembath, Reg. No. 38,344 jrtrembath@michaelbest.com Michael Best & Friedrich LLP 675 15th Street Suite 2000 Denver, CO 80202 T: 720.240.9515 F: 877.398.5240	Lucas Osborn, Reg. No. 59,528 lsosborn@michaelbest.com Michael Best & Friedrich LLP 4509 Creedmoor Road Suite 501 Raleigh, NC 27612 T: 984.220.8750 F: 877.398.5240

electronically, via e-mail, to mkeipdocket@michaelbest.com (referencing No. 217522-0002), jrtrembath@michaelbest.com and lsosborn@michaelbest.com, by consent of counsel of record for Petitioners.

Dated: June 28, 2023

Respectfully submitted,

/Joseph P. Staley/

Joseph P. Staley (Reg. No. 60,732)
Lead Counsel for Patent Owner

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