

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HILTON DOMESTIC OPERATING COMPANY, INC.,
Petitioner,

v.

R2 SOLUTIONS LLC,
Patent Owner.

Case IPR2023-00689

Patent 8,190,610

**PETITIONER'S REQUEST FOR
REFUND OF POST-INSTITUTION FEES**

STATEMENT OF REQUESTED RELIEF

On March 7, 2023, Hilton Domestic Operating Company, Inc. (“Hilton”) and American Airlines, Inc. (“American”) filed a Petition for Inter Partes Review seeking review of claims 1-46 of U.S. Patent No. 8,190,610. On July 20, 2023, American and Patent Owner filed a Joint Motion to Terminate Proceedings as to American (Paper No. 10). On October 3, 2023, Hilton and Patent Owner filed a Joint Motion to Terminate Proceedings in their entirety (Paper No. 19). On October 4, 2023, the Patent Trial and Appeal Board issued its Decision Settlement Prior to Institution of Trial (Paper No. 21). Petitioners challenged 46 claims, and paid post-institution fees, calculated as follows:

- \$22,500 (for up to 20 claims per 37 CFR § 42.15(a)(2))
- \$19,500 (\$750 for each claim in excess of 20 claims per 37 CFR § 42.15(a)(4))

Accordingly, Petitioner is entitled to a refund in the amount of \$42,000, and respectfully requests a refund of that amount. Payment of these Post-Institution fees was processed through PRPS. Upon review and approval of this request, Petitioner respectfully requests that the Board credit the post-institution fee to Deposit Account No. 231951.

Respectfully submitted,

Dated: November 1, 2023

/Kyle Smith/_____
Kyle Smith
Reg. No. 78,579
ksmith@mcguirewoods.com
McGuireWoods LLP
501 Fayetteville St.
Raleigh, NC 27601
Telephone: (919) 755-6600
Facsimile: (919) 755-6699

Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on November 1, 2023, a true and correct copy of the foregoing was served electronically on the following counsel of record for Patent Owner:

Carder W. Brooks
Registration No. 75,456
NELSON BUMGARDNER
CONROY P.C.
3131 W. 7th Street, Suite 300
Fort Worth, Texas 76107
Telephone: (817) 377-9111
Email: carder@nelbum.com

Brent N. Bumgardner
Registration No. 48,476
NELSON BUMGARDNER
CONROY P.C.
3131 W. 7th Street, Suite 300
Fort Worth, Texas 76107
Telephone: (817) 377-9111
Email: brent@nelbum.com

R2Solutions-IPR@nelbum.com

By: /Kyle Smith/
Kyle Smith (Reg. No. 78,579)