

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC. and
MOTOROLA MOBILITY LLC,
Petitioners

v.

THETA IP, LLC,
Patent Owner

IPR2023-00697
Patent No. 10,129,825 B2

**PETITIONERS' AMENDED MANDATORY NOTICES
PURSUANT TO 37 C.F.R. § 42.8**

I. INTRODUCTION

In accordance with 37 C.F.R. § 42.8, Petitioners submit the following amended Mandatory Notices in connection with the above-captioned *inter partes* review (IPR) proceeding of U.S. Patent No. 10,129,825 (“the ’825 patent”).

II. MANDATORY NOTICES

Real Party-in-Interest: The real parties-in-interest for this Petition are Lenovo (United States) Inc. (“Lenovo US”); Motorola Mobility LLC (“Motorola”); and Lenovo Group Ltd (“LGL”).¹

Related Matters: Patent Owner has asserted the ’825 patent against Lenovo US, Motorola, and LGL in *Theta IP, LLC v. Motorola Mobility LLC, et al.*, 1:22-cv-03441 (N.D. Ill.) (“co-pending litigation”).

The ’825 patent issued from U.S. Application No. 15/080,432, which is a continuation of U.S. Application No. 11/318,646 (“the ’646 application”), which matured into U.S. Patent No. 9,331,728. The ’646 application is a continuation of U.S. Application No. 10/784,613 (“the ’613 application”), which matured into U.S. Patent No. 7,010,330 (“the ’330 patent”). The ’613 application claims the benefit

¹ Petitioners identify LGL out of an abundance of caution because it is a named party in the co-pending litigation, but maintain that LGL is not a proper party to the co-pending litigation.

of priority to U.S. Application No. 60/451,229 (“the ’229 application”) and U.S. Application No. 60/451,230 (“the ’230 application”), both of which are expired provisional applications.

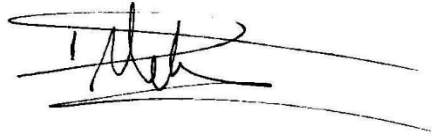
Petitioners filed a petition for IPR challenging claims 1, 23, 29, and 30 of the ’330 patent.

Petitioners also filed a petition for IPR challenging claims 7-11, 13, and 19-21 of U.S. Patent No. 10,524,202 (“the ’202 patent”), which is also assigned to Patent Owner and is a continuation of the ’613 application.

Counsel and Service Information: Lead counsel is Dinesh N. Melwani (Reg. No. 60,670), and Backup counsel are Sangwoo Ahn (Reg. No. 76,905) and William R. Uhr (Reg. No. 71,282). Service information is: Bookoff McAndrews, PLLC, 2000 Pennsylvania Ave., NW, Suite 4001, Washington, DC 20006; Tel.: 202.808.3497; Fax.: 202.450.5538; email: docketing@bomcip.com, dmelwani@bomcip.com, sahn@bomcip.com, and wuhr@bomcip.com.

Petitioners consent to electronic service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Melwani', with a long horizontal line extending to the right.

Dated: April 12, 2024

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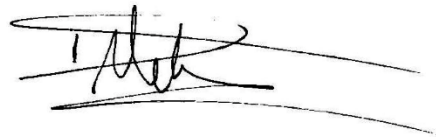
CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned hereby certifies that this
“PETITIONERS’ AMENDED MANDATORY NOTICES PURSUANT TO 37
C.F.R. § 42.8” was served by filing this document through the Patent Trial and
Appeal Case Tracking System (P-TACTS) and via e-mail to the following
attorneys of record for the Patent Owner listed below:

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Dated: April 12, 2024

Respectfully submitted,



By: _____
Dinesh N. Melwani (Reg. No. 60,670)
Counsel for Petitioners