UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC

Petitioner

v.

DDC TECHNOLOGY, LLC,

Patent Owner

U.S. Patent No. 10,528,199

Case No.: IPR2023-00709

PETITIONER'S REPLY

TABLE OF CONTENTS

I. INTRODUCTION 1

II. PETITIONER'S DEFINITION OF A PERSON OF ORDINARY SKILL IN THE ART IS CORRECT 1

III. PO'S OBVIOUSNESS ARGUMENTS ARE UNPERSUASIVE 2

A. PO IMPROPERLY CHALLENGES ONLY KONDO RATHER THAN THE KONDO/CHU COMBINATION 3

B. PO'S OTHER MOTIVATION-TO-COMBINE ARGUMENTS FOR CLAIM 1 FAIL 6

C. PO PROVIDES NO ADDITIONAL ARGUMENTS FOR CLAIMS 2, 4-6, 17-26, 30, 34, 35, AND 37-39 7

IV. PO'S SECONDARY CONSIDERATIONS ARE UNPERSUASIVE AND BASED ON BIASED EVIDENCE 8

A. PO'S SECONDARY CONSIDERATIONS ARGUMENTS LACK NEXUS 8

B. THERE WAS NO LONG-FELT NEED BECAUSE CONDUCTIVE/CAPACITIVE INPUT MECHANISMS WERE KNOWN IN THE ART 11

C. PO'S COPYING CASE FAILS AS A MATTER OF LAW 12

D. GOOGLE ASSISTED PO IN ITS DEVELOPMENT AND PROVIDED BUSINESS OPPORTUNITIES, CUSTOMERS, AND ENCOURAGEMENT, NOT PRAISE 14

E. THERE IS NO EVIDENCE THAT A CONDUCTIVE INPUT MECHANISM DROVE SALES OF PO'S AND GOOGLE'S VR VIEWERS 14

V. CONCLUSION 16

I. INTRODUCTION

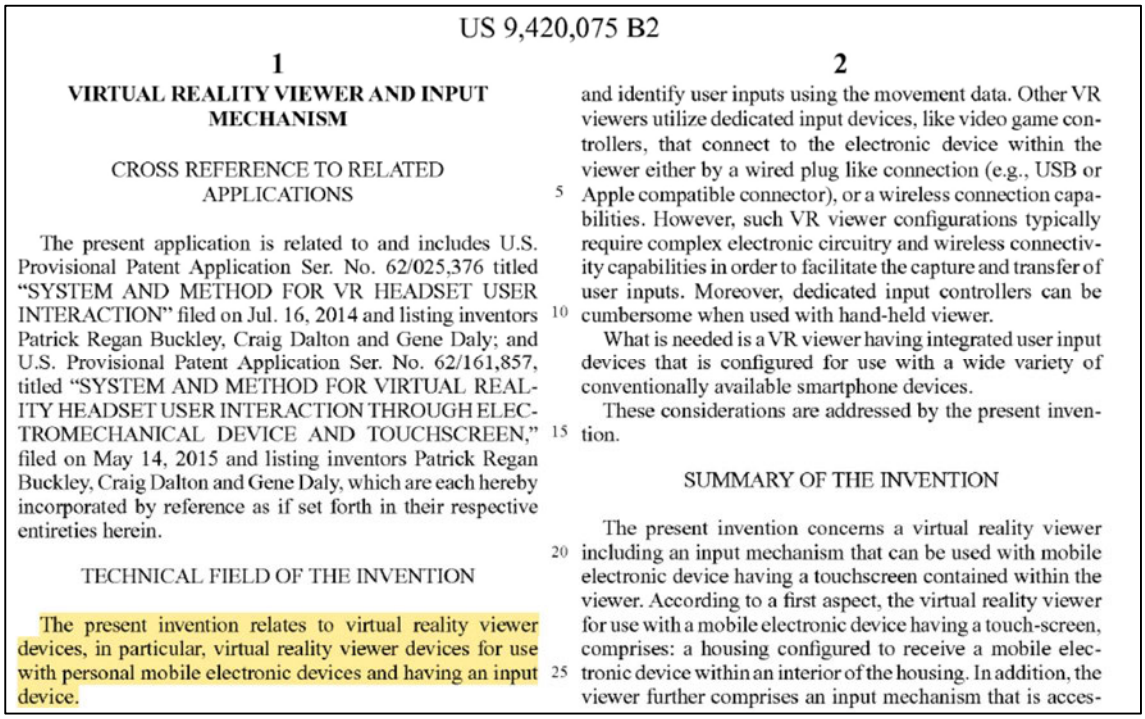
Patent Owner ("PO") responds to the Petition by arguing against the prior art's clear disclosures and proffering secondary considerations that lack nexus to the challenged claims and misstate the record. PO's arguments should be rejected.

II. PETITIONER'S DEFINITION OF A PERSON OF ORDINARY SKILL IN THE ART IS CORRECT

PO incorrectly argues that POSA must have "sufficient experience in 'touchscreen technology' and 'capacitive/conductive technology and materials,' because they are pertinent to the inventive elements of the claimed invention." POR, p. 2. Such detailed knowledge of touchscreen implementation is unnecessary because the '199 patent does not improve touchscreen technology or even claim to. In fact, the patent explains that its "pad and electrical shield material work … so that ***any form of touch screen technology*** will register a touch event…." EX1001, 11:20-24. Thus, the details of any particular touchscreen are irrelevant to the patent. Indeed, the patent's inventor, Mr. Buckley, is a mechanical engineer who has no experience implementing touchscreens. EX1023, 133:14-20, 140:22-25.

Petitioner's POSA definition is proper because it is grounded in the field of the invention of the '199 patent and its related family members, which states

"virtual reality viewer devices for use with personal mobile electronic devices and having an input device."



US 9,420,075 B2

1

VIRTUAL REALITY VIEWER AND INPUT MECHANISM

CROSS REFERENCE TO RELATED APPLICATIONS

The present application is related to and includes U.S. Provisional Patent Application Ser. No. 62/025,376 titled "SYSTEM AND METHOD FOR VR HEADSET USER INTERACTION" filed on Jul. 16, 2014 and listing inventors Patrick Regan Buckley, Craig Dalton and Gene Daly; and U.S. Provisional Patent Application Ser. No. 62/161,857, titled "SYSTEM AND METHOD FOR VIRTUAL REALITY HEADSET USER INTERACTION THROUGH ELECTROMECHANICAL DEVICE AND TOUCHSCREEN," filed on May 14, 2015 and listing inventors Patrick Regan Buckley, Craig Dalton and Gene Daly, which are each hereby incorporated by reference as if set forth in their respective entireties herein.

TECHNICAL FIELD OF THE INVENTION

The present invention relates to virtual reality viewer devices, in particular, virtual reality viewer devices for use with personal mobile electronic devices and having an input device.

2

and identify user inputs using the movement data. Other VR viewers utilize dedicated input devices, like video game controllers, that connect to the electronic device within the viewer either by a wired plug like connection (e.g., USB or Apple compatible connector), or a wireless connection capabilities. However, such VR viewer configurations typically require complex electronic circuitry and wireless connectivity capabilities in order to facilitate the capture and transfer of user inputs. Moreover, dedicated input controllers can be cumbersome when used with hand-held viewer.

What is needed is a VR viewer having integrated user input devices that is configured for use with a wide variety of conventionally available smartphone devices.

These considerations are addressed by the present invention.

SUMMARY OF THE INVENTION

The present invention concerns a virtual reality viewer including an input mechanism that can be used with mobile electronic device having a touchscreen contained within the viewer. According to a first aspect, the virtual reality viewer for use with a mobile electronic device having a touch-screen, comprises: a housing configured to receive a mobile electronic device within an interior of the housing. In addition, the viewer further comprises an input mechanism that is acces-

Petitioner refers to the field of the invention of U.S. Pat. No. 9,420,075 patent (the "'075 patent," an ancestor of the '199 patent, which claims priority to the '075 patent through a series of continuations) because the '199 patent was filed without a "field of the invention." Pet., p. 14; MPEP §608.01(c)(1).

III. PO'S OBVIOUSNESS ARGUMENTS ARE UNPERSUASIVE

PO addresses only Kondo—not the Kondo/Chu combination—and attacks only one of Petitioner's motivations to combine, leaving the others unrebutted. PO's arguments should be rejected.

A. PO IMPROPERLY CHALLENGES ONLY KONDO RATHER THAN THE KONDO/CHU COMBINATION

Kondo expressly discloses a projected-capacitive touchscreen on a smartphone. EX1003, ¶¶0023-0024 ("the touch panel 1506 is a ***projected capacitive touch panel***"). PO, nonetheless, spends many pages discussing how Kondo cannot use a projected-capacitive touchscreen, and must use a surface-capacitive touchscreen instead. POR, pp. 4-12. Based on this false premise, PO then argues that a POSA would not integrate a surface-capacitive touchscreen into a smartphone and that "[a] POSA ... who was considering combining Kondo's and Chu's patents would therefore be faced with combining designs created for two different and incompatible technologies." POR, pp. 11-12. PO's arguments fail for several reasons.

First, PO rewrites Kondo to avoid unpatentability by asserting it cannot be "projected-capacitive," when Kondo expressly says the opposite as quoted above. EX1003, ¶0024.

Second, PO addresses Kondo alone and does not address the teachings of the Kondo/Chu combination, which is the ground that Petitioner is presenting. *Bradium Techs. LLC v. Iancu*, 923 F.2d 1032, 1050 (Fed. Cir. 2019) ("A finding of obviousness, however, cannot be overcome 'by attacking references individually where the rejection is based upon the teachings of a combination of references.'"). PO does not even address Chu other than a conclusory statement that its

touchscreen technology is somehow incompatible with Kondo's *without any explanation*, which is insufficient. POR, pp. 11-12.

Third, PO's argument simply does not matter because the '199 patent's claims are not limited to any type of touchscreen as discussed in §II. Thus, PO's mischaracterization of the Kondo/Chu combination as limited to solely a surface-capacitive touchscreen is irrelevant to whether the combination satisfies the '199 patent's claims. In any event, Petitioner's Kondo/Chu combination is not limited to any particular type of capacitive touchscreen, but can work with all types, as well as resistive touchscreens. Pet., §XI.

Fourth, even if the type of capacitive touchscreen used in Kondo were relevant, PO's basis for disputing whether Kondo discloses a projected-capacitive touchscreen is based on a few scant details about how Kondo's projected-capacitive touchscreen works. But Kondo provides few details because, as it explains, the operation of a projected-capacitive touchscreen was well known in the art. Specifically, after stating that its touchscreen is a projected capacitive touch screen, Kondo explains that "the method for calculating such contact position can be a known technique as appropriate, and therefore *the description thereof is omitted in this specification*." EX1003, ¶24 (emphasis added). Thus, PO's objection to Kondo's description is a red herring and does not contradict Kondo's express disclosure of using a projected capacitive touchscreen.

Fifth, PO engages in further misdirection when it argues that "Kondo's emphasis on the need for protection against static electricity" supports that Kondo's touchscreen is surface capacitive. POR, pp. 6-10. Kondo's concern is driven by its desire to prevent a malfunction in the VR viewer's touch circuit that leads from the user's finger to the touchscreen, and does not indicate the touchscreen is surface capacitive. Indeed, Kondo's ¶12 explains that static electricity is dissipated to prevent malfunction not of the touchscreen, but of the remote touch circuit, which is a separate component shown as reference numeral 70 in Fig. 7. EX1003, ¶0012 (". . . static electricity can be prevented from building up on the exterior, preventing malfunction of the remote touch circuit"). PO and its expert observe that "[a] stable reference ground is *critically important* in a surface-capacitive touchscreen…." POR, p. 10; EX2050, ¶41 (emphasis added). But, in Kondo, any grounding is *optional*. EX1003, ¶57 ("depending on the sensitivity of the touch panel 1506, it is of course possible to omit the circuit for grounding."). Additionally, PO's reference to Kondo's ¶39 as demonstrating a need to protect against static electricity similarly does not support its contention, as that paragraph merely describes the type of material that electrical wire 72 is made of, not the function it performs: "formed of a material that is conductive ***or*** that dissipates static electricity on a flexible sheet 73…." (emphasis added).

B. PO'S OTHER MOTIVATION-TO-COMBINE ARGUMENTS FOR CLAIM 1 FAIL

Beyond its flawed arguments about types of capacitive touchscreens, PO's remaining arguments against combining Kondo/Chu are also unpersuasive. PO first argues that a POSA wouldn't add moving parts to Kondo because there is no technical or user benefit. POR, p. 13. But, PO ignores and does not address the many benefits that the Petition identified for combining Kondo/Chu, including: (1) enabling varying inputs, such as recognizing different inputs by pressure; (2) allowing swipe input; (3) waterproofing the device; and (4) allowing the device to be cleaned more easily. Pet., §XI(C).

Next, PO attacks Petitioner's motivation argument about enabling the Kondo/Chu combination to work with both capacitive and resistive touchscreens by claiming that resistive touchscreens in 2014 had little market share and phones with resistive touchscreens didn't have the processing power or display resolution for VR applications. But, as stated above, PO's argument does not address Petitioner's other motivation arguments. Pet., §XI(C). Regardless, PO's argument is contradicted by the patent itself, which is agnostic as to the type of touchscreen and expressly mentions that it should function with "resistive touchscreens." EX1001, 7:14-17, 11:24-28 (stating that the alleged invention should work "on a variety of touch screen technologies such as capacitive, *resistive*, or conductive touch screen technologies.") (emphasis added); *see generally* 2:37-39; 3:48-53;

4:3-15; 11:24-28. And the Compton reference, applied during prosecution of the '075 patent (ancestor to the '199 patent, see Pet. p. 14; EX1027, p. 22) and published just a year before the '075 patent's priority date, recognized the desirability of working with both "capacitive screens" and "pressure sensitive [i.e., resistive] screens." EX1022, ¶0050.

Petitioner's expert, Mr. Keller, also explained that consumers using smartphones as their display device in a VR viewer would be cost-conscious, may not have the latest cellphone, and are "probably going to be using non-top-of-the-line or first rate display," meaning that those consumers would look to lower-cost smartphones with resistive touchscreens. EX2053, 137:19-138:5, 138:6-139:1. Mr. Keller also disagreed that resistive touchscreen smartphones did not have the processing power to run VR applications by citing applications that did not require much processing power, like "static images, such as the old View-master style" and showing "stereo imagery of some travel locations, things like that." EX2053, 139:20-140:1, 140:10-24, 141:5-14.

C. PO PROVIDES NO ADDITIONAL ARGUMENTS FOR CLAIMS 2, 4-6, 17-26, 30, 34, 35, AND 37-39

For all challenged claims other than claim 1, PO relies solely on the arguments it made for claim 1. As such, those claims are unpatentable for the reasons provided above.

IV. PO'S SECONDARY CONSIDERATIONS ARE UNPERSUASIVE AND BASED ON BIASED EVIDENCE

Secondary considerations "simply cannot overcome a strong *prima facia* case of obviousness," which Petitioner has shown. *Wyers v. Masterlock*, 616 F.3d 1231, 1246 (Fed. Cir. 2010).

Moreover, PO's secondary consideration case is based entirely on the testimony of the '075 patent's sole inventor, Patrick Buckley. Mr. Buckley is biased, not only because he is an inventor, but also because [redacted] EX1023, 124:22-126:25, 129:13-131:25. In fact, he is obligated to support enforcement actions filed by PO. EX1023, 127:1-16. The Board should give Mr. Buckley's testimony little, if any, weight.

A. PO'S SECONDARY CONSIDERATIONS ARGUMENTS LACK NEXUS

Although PO claims a presumption of nexus, its claim chart, which attempts to map the patent to the product of the prior assignee, DODOcase, lacks clarity, detail, and sufficient explanation. POR, pp. 24-33. But even if the Board finds a presumption is warranted, Petitioner may rebut by presenting evidence. *WBIP, LLC v. Kohler Co.,* 829 F.3d 1317, 1330 (Fed. Cir. 2016). One way to show a lack of nexus is if the evidence "'exclusively relates to a feature that was '*known* in the prior art'—not necessarily well-known'" including through obviousness. *Yita v.*

MacNeil, 69 F.4th 1356, 1364 (Fed. Cir. 2023). Here, PO claims its distinguishing feature is "the user input mechanism," a conductive/capacitive input mechanism in general. POR, p. 33; EX2054, ¶¶3, 4, 6, 7. But Petitioner has demonstrated capacitive/conductive inputs, as well as all other features of PO's alleged invention, were known and obvious in view of the prior art.

Even PO has admitted that a conductive/capacitive input mechanism is not novel. During prosecution of the '075 patent (ancestor to the '199 patent), PO faced an anticipation rejection based on Compton (US 2013/0141360) which discloses a conductive/capacitive input mechanism on a VR viewer. EX1022, ¶¶0044-0050; cls. 1, 6, 9, 10, 11, 14; Figs. 1-6b. As shown in EX1027 on page 22, PO amended its input mechanism claim element during prosecution to be patentable over the Compton reference as follows:

> an input mechanism that is accessible from an exterior of the housing and is moveable within the interior between at least a first position and an extended position, the input mechanism comprising:
>
> an electrical shield having a surface, wherein only a portion of ~~a~~ the surface of ~~the input mechanism~~ the electrical shield is configured to contact a central region of the touch-screen of the mobile electronic device when the input mechanism is in the extended position.

During prosecution of the '199 patent, PO had to amend its claims similarly, as shown below, in response to an obviousness rejection, where one of the cited references was a "continuation in part of Compton."

a touchscreen input constructed of ~~conductive~~ material and having a surface such that only a portion of the surface of ~~, wherein~~ the touchscreen input is configured to contact a central region of the touchscreen of ~~in physical contact with the touchscreen upon receipt of~~ the mobile electronic device when the touchscreen input is activated.

EX1008, p. 69, 77.

In remarks, the PO confirmed that these amendments paralleled those made during prosecution of the '075 patent to overcome Compton.

> One or more of the limitations that were identified by the examiner as distinguishing Compton during the prosecution of the ['075 patent] have been added to amended independent claims 1 and 18 in the present application.

Id.

Thus, per the PO's own admission, the only allegedly novel features that could form the basis of a secondary considerations case would be those limitations added by amendment (*e.g.,* a touchscreen input constructed of material and having a surface such that only a portion of the surface of the touchscreen input is configured to contact a central region of the touch-screen"). *Lectrosonics, Inc. v. Zaxcom, Inc.,* IPR2018-01129, paper 33, at 33 (Precedential).

That, however, is not PO's secondary considerations case. Instead, PO mischaracterizes and broadens the alleged invention to any conductive/capacitive

input mechanism on a VR viewer, and then makes the nexus arguments based on this mischaracterization. See, *e.g.*, POR, pp. 66.

But conductive/capacitive input mechanisms for VR viewers were replete in the prior art, as shown by Kondo (Pet., §§XI(A)), the Kondo/Chu combination (Pet., §§XI(A-C), XII(A)(4)), and Compton (EX1022), as each uses a conductive/capacitive input in a VR viewer. Indeed, Google had been working on a conductive/capacitive input mechanism by June 2014, when PO mentioned its own. EX1023, 47:13-48:19. And, in fact, one of Google's engineers met with Mr. Buckley and other of his colleagues to provide "tips" Google learned from that development and to "brainstorm" about PO's conductive input device. EX1023, 47:13-48:19, 52:16-56:20; EX2034. Importantly, Mr. Buckley filed his first provisional application on the same day as this meeting. EX1023: 64:3-21. Because a conductive/capacitive input mechanism for a VR viewer was known in the art, PO cannot show nexus for its secondary considerations.

B. THERE WAS NO LONG-FELT NEED BECAUSE CONDUCTIVE/CAPACITIVE INPUT MECHANISMS WERE KNOWN IN THE ART

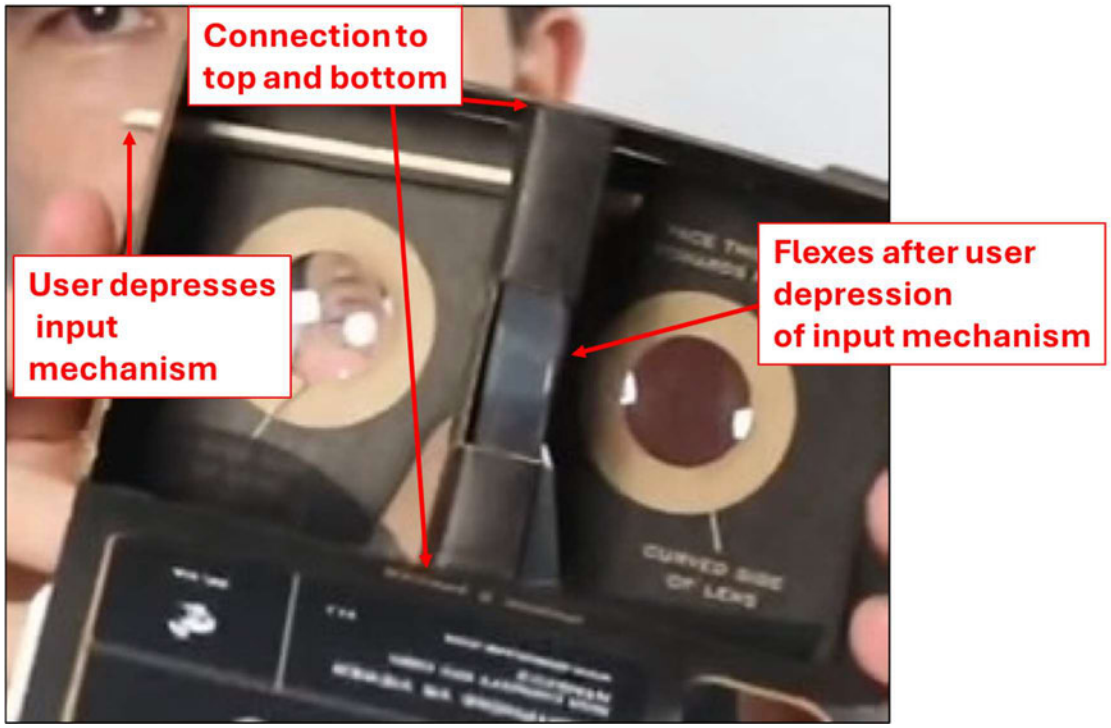
As shown in §IV(A), conductive/capacitive input mechanisms for VR viewers were known. PO's long-felt need argument therefore fails as a matter of law. *Geo. M. Martin Co. v. Alliance Machine Systems Intern. LLC*, 618 F.3d 1294, 1304-1305 (Fed. Cir. 2010).

C. PO'S COPYING CASE FAILS AS A MATTER OF LAW

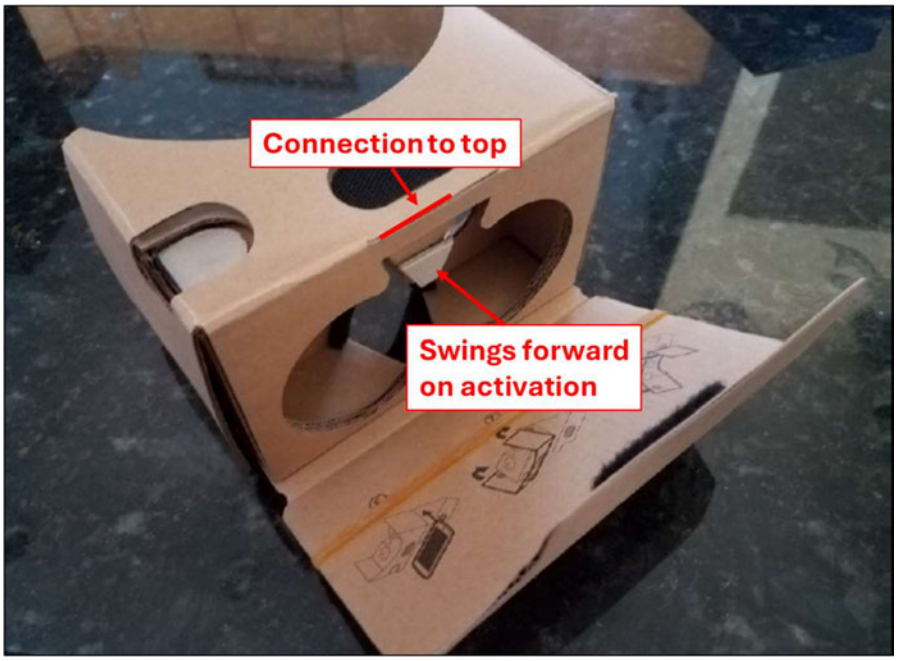
PO presents its copying case by comparing Google's Cardboard product to claim 1. POR, pp. 34-54. However, "the copying inquiry involves a comparison of the competitor's product with the allegedly copied patent product, rather than the patent's claims…." *Medtronic v. Teleflex,* 70 F.4th 1331, 1340 (Fed. Cir. 2023). As such, PO's copying argument should be disregarded as a matter of law.

Moreover, even a cursory comparison between Google cardboard's input mechanism (POR, pp. 34-54) and PO's (POR, pp. 25-33) demonstrates a remarkable difference.[1] PO's input mechanism connects to the VR viewer's top and bottom and flexes towards the touchscreen. Google's input mechanism, on the other hand, is attached to the VR viewer's top only and swings forward.

[1] The product features other than the input mechanisms are similar because PO based its product on Google's. EX1023, 27:8-29:23.



PO's device. POR, p. 30 (annotations added).



Google Cardboard V2. POR, 35 (annotations added).

D. GOOGLE ASSISTED PO IN ITS DEVELOPMENT AND PROVIDED BUSINESS OPPORTUNITIES, CUSTOMERS, AND ENCOURAGEMENT, NOT PRAISE

The 2014 email communications cited by PO do not show praise from Petitioner to PO's predecessor-in-interest, DODOcase. Rather, DODOcase's founder and representative in the emails, Mr. Buckley, testified that Petitioner provided him and DODOcase with technical input, [redacted], marketing opportunities, business opportunities, advertising, and technical "tips" and "brainstorming" on its allegedly novel input mechanism. See §IV(A); EX1023, 25:2-11, 47:1-62:9, 74:18-79:14. Petitioner even provided DODOcase with suppliers, cheered them along to help them succeed, and promoted them at every opportunity, even to Google executives. EX1023, 45:17-19, 61:5-9, 61:20-62:5, 82:12-83:5; EX1026, pp. 1, 2. Petitioner's 2014 comments about PO's input mechanism were thus directed at encouraging and supporting a then-business partner in DODOcase, not at praising the alleged invention.

E. THERE IS NO EVIDENCE THAT A CONDUCTIVE INPUT MECHANISM DROVE SALES OF PO'S AND GOOGLE'S VR VIEWERS

PO presented evidence of sales, but "evidence of commercial success alone is not sufficient …. Rather, the proponent must offer proof 'that the sales were a direct result of the unique characteristics of the claimed invention—as opposed to other economic and commercial factors unrelated to the quality of the patented

subject matter.'" *In re DBC*, 545 F.3d 1373, 1384 (Fed. Cir. 2008) (citations omitted). Here, PO's evidence fails for several reasons.

First, PO relies on inaccurate public information to suggest that Cardboard V2, with a "capacitive button" sold at about "10x" (1,000%) the rate as the prior Cardboard V1, without the button (POR, p. 62). But Mr. Buckley admitted that the three exhibits (EX2057, EX2058, and EX2059) he cited to show Google's sales information are third party sources and he did not know if they were accurate of what their cited figures represented. In particular, he cannot say whether the cited sales figures are for only viewers sold by Google or include sales from all members of the Google's Works with Google Cardboard (WWGC) program. EX1023, 147:4-153:3,168:8-25. The WWGC program provided third party members with marketing, branding, advertising, sales, and the prestige associated by working with Google for having a compatible VR viewer. EX1023, 57:22-59:15, 77:15-21, 87:12-95:24; Paper 15, pp. 7-8.

Second, in the underlying district court proceeding, Petitioner produced the actual sales numbers for itself and all WWGC members, and those figures contradict PO's cited third-party sources. [redacted]—a far cry from the 1,000% increase

suggested by PO and Mr. Buckley. This modest increase was not due to the "capacitive button" introduced in V2. Rather, the increase was due to the continued growth of the WWGC program. Moreover, not all WWGC members used capacitive input mechanisms in their VR viewers after Cardboard V2 was released, because it was not a requirement. EX2043, p. 3. Indeed, Mr. Buckley admitted that he did not know what kind of input mechanism (*e.g.*, magnets or conductive) were used by many of the WWGC members. EX1023, 97:14-106:15.

Third, through the WWGC program, Petitioner provided marketing, advertising, branding, and sales for all WWGC members, including DODOcase (PO's predecessor in interest). *See* §IV(D). WWGC drove sales for DODOcase, as admitted by Mr. Buckley. EX1023, 58:12-59:15. In fact, Mr. Buckley stated that WWGC website referrals [redacted] EX1023, 77:15-78:6. PO therefore cannot show that any sales increase was solely due to a conductive/capacitive input mechanism.

V. CONCLUSION

PO's arguments are simply unavailing. Petitioner thus respectfully requests the Board to cancel all challenged claims.

Respectfully Submitted,

Dated: April 24, 2024

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PETITIONER'S EXHIBIT LIST

April 24, 2024

EX1001	U.S. Patent No. 10,528,199
EX1002	Declaration of Kurtis Keller
EX1003	Kondo (JP3176588)
EX1004	Chu (US 2013/0082963)
EX1005	U.S. Pat. No. 8,957,835
EX1006	Random House Webster's College Dictionary (2000)
EX1007	Not used
EX1008	Selected portions of '199 Patent's prosecution history
EX1009	*DDC v. Merge Labs* complaint
EX1010	*DDC v. Google, et al.* infringement contentions
EX1011	DDC's '199 patent infringement chart for Google
EX1012	*DDC v. Google* Transfer Order
EX1013	Transcript of 6-13-2023 conference call
EX1014	Patent Owner 6-5-2023 email to Board
EX1015	6-26-2023 email between parties
EX1016	Order Granting Stay

EX1017	DDC v. OPS docket
EX1018	Google response to RFAs
EX1019	CONFIDENTIAL Agreement to mediate
EX1020	TX Civil Practice and Remedies Code Chapter 154
EX1021	Not used
EX1022	Compton – US 2013/0141360
EX1023	CONFIDENTIAL Buckley Deposition Transcript
EX1024	HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY – Revenue data for WWGC members. Third worksheet of a spreadsheet produced natively at the district court as GOOG-DDC-0000364.
EX1025	Declaration of Michael L. Kiklis
EX1026	CONFIDENTIAL email correspondence
EX1027	Selected pages of the file history for US Pat. No. 9,420,075.
EX1028	Not used

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing document, excluding the portions exempted under 37 C.F.R. § 42.24(a)(1), contains 2,980 words, which is under the limit of 5,600 words set by 37 C.F.R. § 42.24(c)(1).

Respectfully Submitted,

Dated: April 24, 2024

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CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) of PETITIONER'S REPLY by filing this document through the USPTO Patent Trial and Appeal Case Tracking System and by emailing a copy to the following email addresses:

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Respectfully Submitted,

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