

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONOS, INC.,
Petitioner,

v.

GOOGLE, LLC,
Patent Owner.

Case No. IPR2023-00806
U.S. Pat. No. 11,050,615

PATENT OWNER'S SUR-REPLY

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I. Introduction

Sonos's arguments in its Reply fail to cure the issues Google identified with the Petition's obviousness positions for claims 6 and 19. Google, in its Patent Owner Response, explained what the applied references disclosed and how those disclosures undermined Sonos's arguments. These cited disclosures are factual evidence, fully supporting Google's arguments—and undermining Sonos's characterization of these arguments as “bare attorney argument.”

For the Roberts-based grounds, Google presents three independent reasons why the Petition's mapping fails to render obvious claims 6 and 19:

1. Sonos presents a new theory that fundamentally changes its argument and should be disregarded. The theory, even if considered, fails to change the outcome, as it is based on unsupported attorney argument and does not render obvious all elements of the claims.
2. Sonos alleges that Roberts “obviously” send a success indication and references certain messages in Roberts to support this position—but nothing in the cited portions discloses these messages. And the expert testimony cited in the Petition relates to Sonos's old argument that failed to address that it was combining the distinct in-band and out-of-band embodiments in Roberts. Simply put, there is no legally sufficient evidence that Sonos's assertion about what could have been done in Roberts would

have been obvious to a person of ordinary skill in the art (POSITA) at the time of invention.

3. Sonos fails to allege that Roberts discloses all claim elements, as it only points to a notification indicating that “*setup*” was successful—but setup only results in providing the enrollee with WiFi credentials for later connection, not that the enrollee successfully entered into the WiFi network, as the claims require.

For the Suumaki ground, Sonos fails to show that the alleged success indications in Suumaki—authentication information 25 or the WSC_Done message—are sent *after* connecting to the WiFi network, as the claims require.

For these reasons, Sonos fails to prove that claims 6 and 19 (and their dependents) are obvious.

II. Google Presents Arguments with Supporting Factual Evidence, Not Bare Attorney Arguments

Sonos's choice to lead its Reply with accusations of Google presenting “bare attorney argument” only highlights that it lacks confidence on the merits. Indeed, as explained below, Sonos's Reply attempts to change its obviousness positions, making new arguments about what a POSITA would have found obvious and how a POSITA would have interpreted the claims—without submitting a new expert declaration to support these positions. *See infra* Section III.A. Those are the types of

“bare attorney arguments” that Sonos argues should have no weight. But these types of arguments differ from Google’s arguments that Sonos complains about.

Sonos argues that Google provides “bare attorney argument” in three instances. Reply, 3. But, for each purported “bare attorney argument,” the Patent Owner Response cites specific disclosures from Roberts and Suumaki that undermine Sonos’s obviousness arguments. *See generally* POR, 6-21. Those citations provide sufficient evidence for the Board to reject Sonos’s arguments. *See Ex Parte Bruce D. Torell*, Appeal No. 2017-008415, 2018 WL 4846950, at *3 (P.T.A.B. Sept. 19, 2018) (noting that “factual evidence” includes “disclosures” from the prior art “references.”).

For the first two instances, Sonos points to portions of Google’s Patent Owner Response that simply walk through what the relevant disclosures of Roberts actually state—including disclosures that Sonos relied on for its Petition mapping. *Compare* POR, 7-8 (citing Roberts, 13:35-36, 13:51-62, and summarizing what these disclosures state) *with* Petition, 36-37 (citing 13:51-62). In fact, Google’s “opinions” on what “setup” means in Roberts (*see* Reply, 3) are consistent with how both Sonos’s Reply and Roberts characterize “setup.” *Compare* POR, 13-14 (noting that “‘setup’ refers to setting up the enrollee device so the device receives the configuration information needed to subsequently connect to the WiFi network”) *with* Reply, 5 (noting that “setup succeed[ing]” involves the enrollee device

receiving wireless network credentials); Roberts, 13:51-62 (“If the setup succeeds,” the enrollee device “delete[s] the L2 data port” and “then” uses received “profile and credentials to connect” to the wireless network).

For the last instance, Sonos simply notes that Google “does the same when assessing Suumaki” without any context or explanation. Again, like for Roberts, Google simply walks through what the relevant Suumaki disclosures state (POR, 15-16)—and Sonos fails to identify a single statement relating to Suumaki for which Google only presents bare attorney argument.

The cases Sonos cites in support are inapplicable as Google presented evidence to support its arguments, whereas the cited cases involved parties asserting arguments without *any* supporting evidence. *See* Reply, 4 (citing *Enzo Biochem, Inc. v. Gen-Probe Inc.*, 424 F.3d 1276, 1285 (Fed. Cir. 2005) in which Enzo “presented no evidence” on whether a practicing product was offered for sale, and *Wasica Finance GmbH v. Continental Auto Sys.*, 853 F.3d 1272, 1284 (Fed. Cir. 2017) in which cross-appellant argued that allegedly anticipatory reference “must” use a constant frequency but “did not adduce any [supporting] evidence”). It is Sonos—not Google—that makes arguments without any supporting evidence, as explained below. *See infra* Section III.A.

III. Sonos's Roberts-based Arguments Do Not Render Obvious Claims 6 and 19

Sonos fails to show that Roberts renders obvious claims 6 and 19 for three independent reasons. First, Sonos fundamentally changed its argument from the Petition to the Reply, presenting a new obviousness theory that the Board should disregard. Even if considered, this new theory fails, as it attempts to assert an obviousness position with no expert support and does not disclose all elements of claims 6 and 19. The other two reasons are based on Sonos's assertions that Roberts discloses something it does not—also showing that Sonos's mapping does not disclose all elements of the claims.

If the Board agrees with Google on any of these points, Sonos has failed to establish that the claims are obvious over Roberts.

A. The Board Should Disregard Sonos's Improper New Reply Arguments or Find That Such Arguments Fail to Render Obvious Claims 6 and 19

Sonos's arguments in the Reply should be rejected as improper new arguments. Even if considered, the Board should reject these arguments as unsupported attorney argument or for failing to disclose a communication “via a communication network,” as the claims require.

Sonos's Petition alleged that Roberts renders obvious a communication allegedly sent when a setup process succeeds and mapped this communication to the

claimed success indication of claims 6 and 19. Pet., 36-37. As Sonos concedes, the alleged communication in the Petition occurs as part of a setup process facilitated through in-band communications using L2 data ports of the 802.11 wireless stack. *Id.*; Reply, 7 (citing Ex. 1004, 9:8-9) (noting that Roberts's disclosed example uses L2 data ports "when engaging in 'setup ... in the conte[x]t of the IEEE 802.11 technology'"); *see generally* Ex. 1004, 9:5-13:62. However, as Google's Patent Owner Response detailed, the Petition's mapping improperly mixed distinct embodiments—relying on Roberts's out-of-band embodiment for claim 1 and the in-band embodiment for claim 6—without explaining why a POSITA would have been motivated to combine these embodiments or whether such a combination would be successful. POR, 10; Reply, 1 (conceding the Petition "rel[ies] on different embodiments in Roberts when assessing claims 1 and 6."); *see In re Stepan Co.*, 868 F.3d 1342, 1346 (Fed. Cir. 2017); *Jackel Int'l Ltd. V. Admar Int'l, Inc.*, No. IPR2015-00979, Paper 7, 2-3, 21 (P.T.A.B. Oct. 1, 2015). In recognizing the errors in its Petition mapping, Sonos changes to a new theory in its Reply: that Roberts's disclosure of in-band communications for setting up the enrollee device can be implemented using out-of-band communications (i.e., L2 ports in the protocol stack for types of wireless communication other than 802.11). Reply, 7.

The Board should disregard Sonos's new theory. This theory fundamentally changes the logic behind Sonos's mapping—instead of relying on communications

relating to the L2 data ports of the 802.11 wireless stack, as cited in the Petition, Sonos is now asserting obviousness based on L2 data ports in out-of-band stacks. *See* PTAB Consolidated Trial Practice Guide (Nov. 2019), 44-45. This new theory relies on Roberts's ability to utilize L2 data ports of out-of-band channels. *See* Reply, 7 (citing Ex. 1004, 9:8-9, 11:18-21, 11:41-42). Sonos's Petition never cited the new disclosures nor did it mention out-of-band L2 data ports in connection with claims 6 and 19. And the Petition's use of the 802.11 stacks L2 data ports for its mapping was intentional. The Petition was trying to use the fact that these ports were part of the 802.11 stack as the reason why the communication would have been "via the communication network" (i.e., via the 802.11 network), as required by the claims. This change in mapping further supports the Board disregarding Sonos's new theory. *See Unified Patents, LLC v. Ikorongo Tech. LLC*, No. IPR2020-01379, Paper 21, 19-20 (P.T.A.B. Feb. 11, 2021) (disregarding disclosures and arguments when Petitioner failed to raise them "in connection with" the specific limitation at issue in the Petition).

Even if the Board considered this new theory, it should reject it as unsupported attorney argument. The theory presents an *obviousness* argument—that Roberts *suggests* using out-of-band communications to facilitate the setup of an enrollee device—but Roberts never explains how this would be implemented. Reply, 7 (citing Ex. 1004, 9:8-9, 11:18-21, 11:41-42). From there, Sonos appears to argue

that the suggested out-of-band communications render obvious the claimed success indication—but Sonos neither expressly states this proposition in the Petition or Reply nor provides any expert testimony or other evidence in support. *See* Pet., 36-37; Reply, 6-8.

Sonos's new theory also unravels its Roberts mapping. Sonos points to communications during the setup process *before* the enrollee uses WiFi credentials to join the WiFi network. Reply, 12. Under Sonos's new theory, however, the communications are on L2 ports of the out-of-band network stack, not the 802.11 (or WiFi) network stack. But Sonos fails to explain why or how a port outside the 802.11 stack would be controlled by communications over the 802.11 network (or even assert that a POSITA would have had a reasonable expectation of success in doing so). Accordingly, the new mapping fails to render obvious the requirement that the claimed communications occur “via the communication network” (i.e., the 802.11 WiFi network in Roberts) obvious. *See* Pet., 20.

B. Sonos Fails to Show Roberts Renders Obvious Multiple Claim Elements

To the extent the Board does not reject Sonos's Roberts-based mapping for the reasons noted in Section III.A, this mapping also fails to render claims 6 and 19 obvious for two additional reasons: Sonos fails to show that (i) Roberts's enrollee contacts the wireless device, as the claims require; and (ii) the alleged

communication in Roberts is sent over the communication network and indicates successful entry into the communication network.

1. Sonos Fails to Show That the Enrollee Sends the Alleged Messages

Claims 6 and 19 require the target device *contact the wireless device* over the communication network after the target device has successfully entered the communication network. POR, 1 (emphases added). Sonos alleges a success indication is “obviously” transmitted indicating that the *setup* process succeeds (Pet., 37) and points to other messages “relating to dedicated L2 port deletion” and “general setup progress” as support that such an indication is sent. Reply, 10. But Roberts does not disclose these other messages—and Sonos fails to show that *any* messages are sent between the enrollee (alleged target device) and registrar (alleged wireless device) after *setup* completes—let alone any messages sent after a WiFi connection is actually made, which occurs at some point after setup succeeds. POR, 11-13.

Roberts does not contemplate sending “messages relating to dedicated L2 port deletion”—this is an assumption that Sonos (and its expert) assert without any support in Roberts. Reply, 10. Roberts discloses a setup process attempting to provide WiFi credentials to the enrollee device (POR, 7-8) and, once this “setup [process] succeeds,” then the L2 ports “on the enrollee device” and on [the] registrar

device” are deleted. *Id.*, 7, 11-12. After the enrollee device deletes its L2 port, it *then* connects to the WiFi network with the received credentials. *Id.*, 7. None of this discloses any “messages relating to dedicated L2 port deletion”—in fact, Roberts explains that the enrollee and registrar unilaterally delete L2 ports. *Id.*, 11-12. Sonos’s position is further undermined, as it relies on factually erroneous assertions that the enrollee device first joins the WiFi network and then deletes its L2 port, opposite of what Roberts expressly discloses. *Compare id.*, 7-8 (Ex. 1004, 13:51-62), *with* Pet., 36-37, Ex. 1003 ¶¶ 250-51, and Reply, 5-6, 10 (alleging “messages [] being sent” after enrollee receives WiFi credentials).

With respect to messages relating to “general setup progress,” Sonos refers to the “system wide visibility” Roberts provides “*into [the] setup progress*” (Reply, 10-11 (citing Ex. 1003 ¶¶ 252-53))—however, this is limited to providing visibility *during the setup process* and does not actually contemplate any specific messages between the enrollee and registrar devices. POR, 12. Even if these messages are exchanged, they would show, at most, messaging before the enrollee has been provided with WiFi credentials for subsequent connection, which does not itself render it obvious that the enrollee also sends an indication after connecting to the WiFi network to indicate that it successfully connected to WiFi. *Id.*, 12; Reply, 10.

Thus, Sonos's ultimate conclusion—that Roberts's "obviously" sends a success indication that Sonos attempts to map to the claimed indication—is conclusory and unsupported.

2. Sonos Fails to Allege that Roberts's Enrollee Indicates Successful Entry Into the WiFi Network

Even assuming Sonos's allegations are true that Roberts's enrollee sends a success indication, Sonos still fails to *allege* that the notification is sent over the communication network and indicates that the target device *has successfully entered the communication network*. POR, 13-14. In the Petition, Sonos asserts that the (presumed) indication notifies the registrar "that the *setup was successful*" (Pet., 37) not that the enrollee successfully entered the WiFi network. As explained above, "setup" only refers to setting up the enrollee device with WiFi credentials for *subsequent* connection to the WiFi network—thus, Sonos's argument fails to even allege that Roberts renders obvious an indication of successful entry into the WiFi network. POR, 13-14; *see supra* Section III.A.

In the Reply, Sonos, for the first time, raises a claim construction issue (Reply, 11-13), arguing that claims 6 and 19 only require an indication of "successful[] ent[ry]" into the communication network and not an indication that the overall commissioning process is "totally complete." Reply, 12; *but see* POR, 14 (Google simply arguing that the alleged notification "could [not] or would [not] indicate to

the registrar that the enrollee device successfully connected to the WiFi network,” not indicating that the commissioning was complete). Sonos then argues that Google improperly required the claimed indication to be “about” network connection and “inform the registrar that the enrollee completed setup such that it is now ‘successfully connect[ed] to the’” communication network. Reply, 11-12.

As explained below, Sonos’s claim construction arguments are (i) improper to raise on Reply, (ii) contradicted by the ’615 patent and Sonos’s own arguments, and (iii) even if accepted, do not overcome Sonos’s failure to even *allege* that that Roberts renders obvious an indication that the enrollee successfully entered the WiFi network.

First, Sonos improperly raises a completely new issue on Reply that the Board should not consider. The Petition and Patent Owner Response applied the plain and ordinary meaning to the claims. Pet., 14; *see generally* POR, 9-14. And Sonos never argued that “successfully enter[ing] the communication network” has a specific meaning different from the plain meaning or one that differentiates it from successfully joining or connecting to a network. *See generally* Pet., 36-37; Ex. 1003, ¶¶246-254. Thus, the Board should disregard Sonos’s argument because it is entirely new and improper to raise on Reply. *See* PTAB Consolidated Trial Practice Guide, 44-45.

Second, to the extent Sonos's construction differentiates "entering the communication network" from connecting to or joining the communication network, the '615 patent and Sonos's own statements contradict such a construction. As the specification of the '615 patent makes clear, the target device sends an indication that it has "successfully connected to the communication network." '615 Pat., Abstract, 11:54-57 ("Once the device to be commissioned *has successfully joined the WLAN*, then the device proceeds to contact the commissioning device via the WLAN to indicate success") (emphasis added). Google's arguments are consistent with this description, as it argued that the alleged notification indicating successful *setup* "could [not] or would [not] indicate to the registrar that the enrollee device successfully connected to the WiFi network." POR, 14.¹ In fact, Sonos's own statements are consistent with this understanding: in the Reply, Sonos explains that

¹ Sonos's argument that Google's "construction" renders Claim 7 meaningless is misguided. Reply, 12-13. As explained, Google construes claim 6 under its plain and ordinary meaning, and Google's arguments are consistent with Claim 7 as they simply assert that the alleged notification in Roberts fails to indicate successful entry into the WiFi network, not that the notification fails to indicate commissioning is complete. POR, 14.

claims 6 and 19 “require” that the “messages indicating the successful joining of a wireless network are in fact transmitted.” Reply, 6.

Third, Sonos’s arguments based on its “entry” construction do not overcome Google’s argument showing Sonos’s failure to even *allege* that that Roberts renders obvious an indication that the enrollee successfully entered the WiFi network. In fact, Sonos’s Reply never attempts to explain how its Petition arguments meet its new construction. Reply, 12 (simply stating that the claims require showing “that enrollee ‘successfully enter[] the communication network’ and transmit a message to that effect” but never explaining how Sonos maps to this requirement). Instead, the Petition only stated that the enrollee device “obviously” includes a notification to the registrar device that “*the setup was successful*” (Pet., 37 (emphasis added))—but, as Google’s Patent Owner Response explains, this “setup” only refers to providing the enrollee device with WiFi credentials needed to subsequently connect to the communication network—not showing successful entry into the communication network. POR, 13-14.

Thus, Sonos never alleges that Roberts sends a communication that indicates successful entry into or joining of a communication network. POR, 13-14.

IV. Sonos's Suumaki-based Arguments Do Not Render Obvious Claims 6 and 19

Sonos's Reply only points to messages in Suumaki transmitted *before* the alleged target device connects to the WiFi network, thereby failing to show a communication “via the communication network” or one that indicates “successful[] ent[ry] [into] the communication network.”

In the Petition, Sonos asserts two arguments—one based on transmitting “authentication information 25” and another on transmitting a “WSC_Done message.”² POR, 16-17. For the authentication information, Sonos stated that this information is part of a request frame that is “transmitted wirelessly” and “employs an IEEE 802.11 standard format.” *Id.*; Petition, 68; Ex. 1003, ¶¶ 458-462 (asserting

² To the extent Sonos's Reply arguments for Claims 6 and 19 rely on “messages” aside from the authentication information 25 and WSC_Done message, those arguments are improper new theories first raised on Reply and, thus, should not be considered. *See* PTAB Consolidated Trial Practice Guide, 73; Pet., 67-68 (relying on “authentication information” as the claimed indication and generally identifying “WSC_Done message”); Reply, 14-15 (noting “multiple ... messages” and “transmit[ing] various messages ... [that] “indicat[e]” that the device has “successfully entered” the network such that device configuration can proceed.).

the same arguments). From there, Sonos concluded that device B (alleged target device) sending the authentication information to the hub device (alleged wireless device) “indicate[s] that” it “has successfully entered the communication network.” POR, 16-17; Petition, 68; Ex. 1003, ¶¶ 458-462. For the WSC_Done message, the entirety of Sonos’s Petition argument simply states that the “Enrollee device” transmits this message “once it processe[s] any received network credentials.” POR, 17; Petition, 68; Ex. 1003, ¶¶ 463. Notably, Sonos did not allege or suggest that device B or the Enrollee device was already connected to the claimed communication network when sending the authentication information or WSC_Done message. *See generally* Pet., 67-68.

Google proved that both communications—the authentication information and the WSC_Done message—occur before the alleged target device connects to the WiFi network and, thus fail to show that the alleged target device sends a message *over the WiFi network that it has successfully connected to the WiFi network*, as claims 6 and 19 require. POR, 17-21.

A. The Reply Fails to Show That the Authentication Information or WSC_Done Message Is Transmitted After Connecting to the WiFi Network

Sonos’s entire mapping is premised on proving that the alleged target device (i.e., device B or the enrollee device) is connected to Suumaki’s WiFi (or WLAN) network (i.e., the claimed communication network) before the device transmits

authentication information 25 or the WSC_Done message. Pet., 68. But Suumaki's disclosures show that these messages are sent *before* the alleged target device connects to the WiFi network and, thus, neither can be sent over the WiFi network or indicate the device successfully entered the WiFi network. POR, 17-21. Sonos's Reply fails to show otherwise. Instead, the Reply misrepresents Suumaki's disclosures in four ways.

First, Sonos argues that the alleged target device (Suumaki's device B or the enrollee device) transmits the authentication information 25 or WSC_Done message "over the wireless network itself" (i.e., WiFi network) (Reply, 13), but the supporting citations fail to show such operation. *See* Reply, 13 (citing Pet., 17-18, and Sonos's claim 6 mapping). The Reply vaguely and improperly references back to its prior art overview of Suumaki—not any arguments it made in the Petition. *Id.* (citing Pet., 17-18, which cites Ex. 1005, 22:1-13, 27:17-21, Fig. 1G); *see Netflix, Inc. v. DivX, LLC*, 84 F.4th 1371, 1377-78 (Fed. Cir. 2023) (explaining that the Board should not "have to decode a petition to locate additional arguments beyond the ones clearly made" and that a "petitioner may not rely on a vague, generic, and/or meandering" statements in a petition to support an argument). But neither the statements in the overview itself nor the cited disclosures disclose that the authentication information or WSC_Done message are transmitted over the WiFi network. The statements and disclosures do not even mention the WSC_Done

message. For the authentication information, they merely note that device B receives and possesses the information—not that it sends it over the WiFi network to indicate successful entry into the WiFi network. *See* Ex. 1005, 22:1-13, 27:17-21, Fig. 1G; POR, 18-19.

Second, Sonos asserts, without *any* supporting evidence or citations, that Suumaki's "device" (i.e., device B or the enrollee device) "seek[s] to join an existing wireless network [and] transmit[s] various messages to a hub over [the wireless] network." Reply, 14. But Sonos's Petition relied only on transmission of specific messages—authentication information and the WSC_Done message—and, as Google explained, those messages failed to meet the claims. POR, 17-21.

Third, Sonos misrepresents Suumaki's disclosures related to the WSC_Done message. Reply, 14 (citing Ex. 1005, 14:53-64, 15:10-12), 15 (citing *id.*, 14:65-15:2). As Google explained, these disclosures show that the Enrollee connects to the WiFi network *after* transmitting the WSC_Done message. POR, 19-20.

The Enrollee also does not "'decide[] to connect to the network' for purposes of running a 'Wi-Fi Simple Configuration EAP method,'" as Sonos's partial quoting suggests. Reply, 14. What Suumaki discloses is that, "[w]hen the Enrollee decides to connect to the network," "[i]t associates with the AP" device to start the WiFi Simple Configuration method. POR, 16. This association is based on transmission of a probe request frame, not connection to the WiFi network, and enables the AP

and Enrollee to exchange messages, which “causes the AP to start running the [Wi-Fi] Simple Configuration EAP method.” POR, 16; Suumaki, 14:54-60; *see* Ex. 1005, 12:21-30 (explaining that the purpose of probe requests is to “advertise the presence of devices that are capable of performing Wi-Fi Protected Setup operations”), 13:4-15. Additional messages M1-M8 are sent during this configuration process and, if this process fails, the enrollee can “stay connected” (or associated) with the AP to rerun the process. *Id.*, 15:5-13. As part of the process, the Enrollee device receives credentials and sends a WSC_Done message. POR, 16. After doing so, the Enrollee disassociates (disconnects) “from the AP and reconnect[s]” *to the AP* via the WLAN network using the received credentials. *Id.*

Fourth, Sonos misrepresents Suumaki's disclosures related to the authentication information. Reply, 14-15 (citing Ex. 1005, 27:22-46). This cited disclosure is clear in the steps that occur: device B (i) transmits the authentication information to the hub device (Ex. 1005, 27:30-32), (ii) *then*, after recognizing the authentication information, the hub device *works* to “grant [WiFi] network access” (*id.*, 27:34-38), (iii) associates with the hub device to run a WiFi Simple Configuration method, which results in providing device B WiFi credentials (*id.*, 27:40-46), and, finally, (iv) “disassociates and reconnects to the hub device” using the credentials and is “now connected to the [WiFi] network ... and may communicate ... over the network” (*id.*, 27:47-51). POR, 15-16, 18-19.

Thus, Suumaki does not disclose that the alleged target device (i.e., device B or the enrollee device) connects to the WiFi network *before* it sends the authentication information or WSC_Done message. These messages are always sent before the alleged target device connects to the WiFi network and, thus, cannot be communicated over the WiFi network or indicate successful entry into the WiFi network, as the claims require. POR, 17-21.

V. Conclusion

For the aforementioned reasons, Petitioner fails to meet its burden of establishing that claims 6-8 and 19-20 are unpatentable in view of the asserted prior art grounds.

Respectfully submitted,

Dated: June 4, 2024

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), I, Cory C. Bell, certify that **PATENT OWNER'S SUR-REPLY** contains 4,273 words, excluding those portions identified in 37 C.F.R. § 42.24(a), as measured by the word-processing system used to prepare this paper.

Dated: June 4, 2024

By: /Cory C. Bell/
Cory C. Bell, Reg. No. 75,096

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on June 4, 2024, a copy of
PATENT OWNER'S SUR-REPLY was served upon the below-listed counsel by
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