

Filed on behalf of Guangdong Laitu Imaging Technology Co., Ltd.

By:

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Guangdong Laitu Imaging Technology Co., Ltd. dba Leofoto
Petitioner

v.

Really Right Stuff, LLC
Patent Owner

U.S. Patent No. 8,398,037
Title: Equipment Support

Case No. IPR2023-00853

PETITIONER'S UPDATED MANDATORY NOTICES

Petitioner submits this update to the real parties-in-interest in the mandatory notices under 37 CFR § 42.8. Petitioner submits the original named real-parties-in-interest is correct, and that the two additional real parties-in-interest are being added out of an abundance of caution and without any deceptive intent. Updating the real parties-in-interest does not impact any of the estoppel provisions, and presents no undue burden to the Patent Owner. The Petitioner respectfully requests the update to the real-parties-in-interest be entered, and if necessary, the filing date of the petition be reset to May 02, 2023, the date this updated real parties-in-interest was filed.

I. GROUNDS FOR STANDING (37 C.F.R. § 42.104(a))

Petitioner hereby certifies that the '037 Patent is available for *Inter Partes* Review ("IPR"), and that Petitioner is not barred or estopped from requesting IPR of the Challenged Claims on the grounds identified herein. Specifically: (i) Petitioner is not the owner of the '037 Patent; (ii) Petitioner has not, and no real party-in-interest to Petitioner has, filed a civil action involving the '037 Patent; (iii) the estoppel provisions of 35 U.S.C. §315(e)(1) do not prohibit this IPR; (iv) this Petition is filed more than nine months after the date of grant of the '037 Patent; and (v) Petitioner, or any real party-in-interest, has not previously filed a petition for IPR of the '037 Patent.

II. MANDATORY NOTICES (37 C.F.R. § 42.8)

A. Updated Real Party-In-Interest

The real parties-in-interest are:

1. Guangdong Laitu Imaging Technology Co., Ltd. dba “Leofoto”, a company operating out of China;
2. Super Photo Gear, LLC dba “Leofoto USA”, a separate company operating out of the United States; and
3. Desmond Photographic Distributors Inc., a separate company operating out of the United States.

To the best of Petitioner’s knowledge, additional real parties-in-interest include the patent owner Really Right Stuff, LLC.

Respectfully submitted,

Date: 05/02/2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PETITIONER'S UPDATED MANDATORY NOTICES under 37 CFR § 42.8 was served on May 02, 2023 electronically via email to Kevin Russel at kevin@chernofflaw.com and to patent.docket@chernofflaw.com, as well as delivering a copy via USPS Priority Mail Express, upon the following parties:

Attorney of Record for U.S. Patent No. 8,398,037:

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Respectfully Submitted,

Date: 05/02/2023

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