

UNITED STATES PATENT AND TRADEMARK OFFICE

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

META PLATFORMS, INC.; INSTAGRAM, INC.; WHATSAPP LLC; META  
PLATFORMS TECHNOLOGIES, LLC; AND GIPHY, INC.,

Petitioners,

v.

VL COLLECTIVE IP LLC,  
Patent Owner.

---

IPR2023-00924

U.S. Patent No. 7,436,980

---

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

---

Pursuant to 37 C.F.R. § 42.8, Petitioners hereby provide the following updated mandatory notices. Only Section III (Lead and Back Up Counsel) has been changed with respect to Petitioners Meta Platforms, Inc.; Instagram, Inc.; WhatsApp LLC; and Meta Platforms Technologies, LLC since these Petitioners filed their Mandatory Notices on May 24, 2023. Paper 3. An Updated Power of Attorney for Petitioners Meta Platforms, Inc.; Instagram, Inc.; WhatsApp LLC; and Meta Platforms Technologies, LLC is submitted herewith. There is no change in counsel or Power of Attorney for Petitioner Giphy, Inc.

**I. REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(B)(1)**

Meta Platforms, Inc., Instagram, Inc., WhatsApp LLC, Meta Platforms Technologies, LLC, and Giphy, Inc. are real parties-in-interest.

**II. RELATED MATTERS UNDER 37 C.F.R. § 42.8(B)(2)**

The '980 Patent is asserted against Petitioners in litigation in the District of Delaware, *VideoLabs, Inc., et al. v. Meta Platforms, Inc. et al.*, Civil Action No. 1-22-cv-00680 (D. Del.), filed May 24, 2022 (the "Delaware Action"). The Delaware Action may affect, or be affected by, decisions in this proceeding. Nothing herein is any endorsement of VideoLabs' or VL Collective IP LLC's position in any litigation.

**III. LEAD AND BACK-UP COUNSEL UNDER 37 C.F.R. § 42.8(B)(3)  
(UPDATED) FOR PETITIONERS META PLATFORMS, INC.;  
INSTAGRAM, INC.; WHATSAPP LLC; AND META PLATFORMS  
TECHNOLOGIES, LLC**

| <b>Lead Counsel</b>                                                                                                                                                                                                                                 | <b>Backup Counsel</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| W. Todd Baker (No. 45,265)<br>todd.baker@kirkland.com<br>Postal and Hand-Delivery Address:<br><b>KIRKLAND &amp; ELLIS LLP</b><br>1301 Pennsylvania Avenue, N.W.<br>Washington, D.C. 20004<br>Telephone: (202) 389-3135<br>Facsimile: (202) 389-5200 | Ellisen Shelton Turner (No. 54,503)<br>ellisen.turner@kirkland.com<br>Postal and Hand-Delivery Address:<br><b>KIRKLAND &amp; ELLIS LLP</b><br>2049 Century Park East, 37th Floor<br>Los Angeles, CA 90067<br>Telephone: (310) 552-4200<br>Facsimile: (310) 552-5900<br><br>Jonathan D. Brit (No. 75,646)<br>jonathan.brit@kirkland.com<br>Postal and Hand-Delivery Address:<br><b>KIRKLAND &amp; ELLIS LLP</b><br>601 Lexington Avenue<br>New York, NY 10022<br>Telephone: (212) 390-4209<br>Facsimile: (212) 446-4900<br><br>Jennifer R. Bush (No. 50,784)<br>jbush@fenwick.com<br>Postal and Hand-Delivery Address:<br><b>FENWICK &amp; WEST LLP</b><br>801 California Street<br>Mountain View, CA 94041<br>Telephone: (650) 988-8500 |

**IV. SERVICE INFORMATION UNDER 37 C.F.R. § 42.8(B)(4)**

Petitioners Meta Platforms, Inc.; Instagram, Inc.; WhatsApp LLC; and Meta Platforms Technologies, LLC concurrently submit an Updated Power of Attorney, 37 C.F.R. §42.10(b), and consents to electronic service to

[Meta\\_VideoLabs@kirkland.com](mailto:Meta_VideoLabs@kirkland.com). There is no change in counsel or Power of Attorney for Petitioner Giphy, Inc.

Petitioners' Updated Mandatory Notices  
IPR2023-00924

Date: January 16, 2024

Respectfully submitted,

/s/ W. Todd Baker

W. Todd Baker (No. 45,265)

todd.baker@kirkland.com

Postal and Hand-Delivery Address:

**KIRKLAND & ELLIS LLP**

1301 Pennsylvania Ave., N.W.

Washington, D.C. 20004

Telephone: (202) 389-5000

Facsimile: (202) 389-5200

Ellisen Shelton Turner (No. 54,503)

ellisen.turner@kirkland.com

Postal and Hand-Delivery Address:

**KIRKLAND & ELLIS LLP**

2049 Century Park East,

Los Angeles, CA 90067

Telephone: (310) 552-4200

Facsimile: (310) 552-5900

Jonathan D. Brit (No. 75,646)

jonathan.brit@kirkland.com

Postal and Hand-Delivery Address:

**KIRKLAND & ELLIS LLP**

601 Lexington Avenue

New York, NY 10022

Telephone: (212) 390-4209

Facsimile: (212) 446-4900

Jennifer R. Bush (No. 50,784)

jbush@fenwick.com

Postal and Hand-Delivery Address:

**FENWICK & WEST LLP**

801 California Street

Mountain View, CA 94041

Telephone: (650) 988-8500

*Attorneys for Petitioners*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served on January 16, 2024, via electronic mail to counsel of record for the Patent Owner at the following:

Christine E. Lehman (Reg. No. 38,535)  
clehman@reichmanjorgensen.com  
Philip J. Eklem (Reg. No. 76,490)  
peklem@reichmanjorgensen.com  
REICHMAN JORGENSEN LEHMAN  
& FELDBERG LLP  
1909 K Street, NW, Suite 800  
Washington, DC 20006

Jaime F. Cardenas-Navia  
jcardenas-navia@reichmanjorgensen.com  
Michael Matulewicz-Crowley (Reg. No. 72,220)  
mmatulewicz-crowley@reichmanjorgensen.com  
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP  
400 Madison Avenue, Suite 14D  
New York, NY 10017

RJ\_VideoLabs-Facebook@reichmanjorgensen.com

/s/ W. Todd Baker  
(No. 45,265)