

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Mercedes-Benz USA, LLC,
Petitioner,

v.

Yechezkal Evan Spero,
Patent Owner.

Case IPR2023-01034
Patent 11,208,029

**PETITIONER'S RESPONSE TO THE NOTICE OF
FILING DATE ACCORDED TO PETITION
AND NOTICE OF DEFECT**

Filed on behalf of Petitioner:
Celine Jimenez Crowson (Reg. No. 40,357)
Joseph J. Raffetto (Reg. No. 66,218)
Scott Hughes (Reg. No. 68,385)
Ryan Stephenson (Reg. No. 76,608)
HOGAN LOVELLS US LLP
555 13th Street N.W.
Washington, D.C. 20004
Telephone: 202.637.5600
Facsimile: 202.637.5710

The Notice of Filing Date Accorded to Petition mailed July 24, 2023 (Paper No. 6) (the “**Notice**”) indicated that a review of the petition identified the following defects:

Pursuant to 37 C.F.R. § 42.63(d)(2)(i), each page must be uniquely numbered in sequence. Please enter corrected exhibits with page numbering.

(Notice at 2.)

Petitioner Mercedes-Benz USA, LLC submits herewith the following corrected exhibits, which now include sequential page numbering to correct the identified defects:

Exhibit No.	Description
(Corrected) EX1002	U.S. Patent No. 11,208,029 File History_Part1
(Corrected) EX1002	U.S. Patent No. 11,208,029 File History_Part2
(Corrected) EX1004	Nikolaos P. Papanikolopoulos CV
(Corrected) EX1008	Apr. 2023 PTAB Trial Statistics

No substantive changes are being made to the petition, and Petitioner submits that these corrected exhibits are timely, as they are being submitted within five business days from the Notice.

Dated: July 27, 2023

Respectfully submitted,

/s/ Celine J. Crowson

Celine Jimenez Crowson (Reg. No. 40,357)

Joseph J. Raffetto (Reg. No. 66,218)

Scott Hughes (Reg. 68,385)

Ryan Stephenson (Reg. 76,608)

HOGAN LOVELLS US LLP

555 13th Street N.W.

Washington, D.C. 20004

Telephone: 202.637.5600

Facsimile: 202.637.5910

Counsel for Petitioner

Certificate of Service

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e) and 37 C.F.R. § 42.105, the foregoing Petitioner's Response to the Notice of Filing Date Accorded to Petition and Notice of Defect, and Corrected Exhibits EX1002, EX1004, and EX1008 was served on July 27, 2023, by electronic mail by serving the correspondence email address of record as follows:

Sangeeta G. Shah (Reg. No. 38,614)
David S. Bir (Reg. No. 38,383)
Andrew B. Turner (Reg. No. 63,121)
BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
Telephone (248) 358-4400
Facsimile (248) 358-3351
sshah@brookskushman.com
dbir@brookskushman.com
btomsa@brookskushman.com
TRCH0110IPR2@brookskushman.com

/s/ Nicole Lynch
Nicole Lynch
Hogan Lovells US LLP
8350 Broad St, 17th Floor
Tysons, VA 22102