

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC,
Petitioner,

v.

YECHEZKAL EVAN SPERO,
Patent Owner.

U.S. Patent No. 9,955,551 C1

Case No.: IPR2023-01039

**PATENT OWNER YECHEZKAL EVAN SPERO'S
MANDATORY NOTICE**

I. Mandatory Notices under 37 C.F.R. § 42.8

Pursuant to 37 C.F.R. § 42.8, the patent owner, Yechezkal Evan Spero (“Patent Owner”), hereby submits the following Mandatory Notice to satisfy the requirements of 37 C.F.R. § 42.8. Patent Owner reserves its rights to supplement or modify these Notices.

A. Real Party-In-Interest – 37 C.F.R. § 42.8(b)(1)

Pursuant to 37 C.F.R. § 42.8(b)(1), the real parties-in-interest are the patent owner, Yechezkal Evan Spero and Torchlight Technologies LLC, the exclusive licensee of the challenged patent.

B. Related Matters - 37 C.F.R. § 42.8(b)(2)

Patent Owner identifies the following related current and/or former proceedings involving the patent-at-issue:

1. *Torchlight Techs. LLC v. Daimler AG et al.*, Civil No. 1:22-cv-00751 (D. Del.), filed June 7, 2022 (pending).
2. *Torchlight Techs. LLC v. General Motors LLC et al.*, Civil No. 1:22-cv-00752 (D. Del.), filed June 7, 2022 (pending).
3. U.S. Reissue Application 16/858,342 (Reissue of U.S. Patent 9,955,551, pending).
4. *Ex Parte* Reexamination 90/014,815 (Reexamination of U.S. Patent U.S. Patent 9,955,551, concluded).

5. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00315 (IPR of U.S. Patent 9,955,551, pending).
6. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00318 (IPR of U.S. Patent 9,955,551, pending).
7. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00336 (IPR of U.S. Patent 9,955,551, institution denied).
8. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01040 (IPR of U.S. Patent 9,955,551, pending).
9. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01225 (IPR of U.S. Patent 9,955,551, pending).

Patents in the same patent family as the ‘551 patent have been subject to multiple patent office proceedings:

1. *Unified Patents v. Torchlight Technologies LLC*, IPR2022-01500 (IPR of U.S. Patent 11,208,029, pending).
2. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2022-01586 (IPR of U.S. Patent 11,208,029, pending).
3. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01034 (IPR of U.S. Patent 11,208,029, pending).

4. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01122 (IPR of U.S. Patent 11,208,029, pending).
5. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01126 (IPR of U.S. Patent 11,208,029, pending).
6. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00197 (IPR of U.S. Patent 10,894,503, pending).
7. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00328 (IPR of U.S. Patent 10,894,503, pending).
8. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00335 (IPR of U.S. Patent 10,894,503, pending).
9. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01026 (IPR of U.S. Patent 10,894,503, pending).
10. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01027 (IPR of U.S. Patent 10,894,503, pending).
11. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01231 (IPR of U.S. Patent 10,894,503, pending).

C. Lead and Back-Up Counsel – 37 C.F.R. § 42.8(b)(3)

The Patent Owner identifies the following lead and back-up counsel:

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Respectfully submitted,

Dated: July 21, 2023

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Certificate of Service

The undersigned hereby certifies that on July 21, 2023, a complete and entire copy of updated **Patent Owner's Mandatory Notice** was served via electronic mail by serving the correspondence email address of record as follows:

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