

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
UPDATED MANDATORY NOTICE**

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

Pursuant to 37 C.F.R. § 42.8(a)(3), Patent Owner, Yechezkal Evan Spero (“Patent Owner”), hereby submits the following Updated Mandatory Notice to update the mailing address of Patent Owner’s counsel associated with the firm Brooks Kushman P.C. and to reflect petitions filed by Porsche Cars North America, Inc. Patent Owner reserves its rights to supplement or modify these Notices.

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

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).
10. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-01296 (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, settled).
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).

12. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-01320 (IPR of U.S. Patent 10,894,503, pending).

13. *Porsche Cars North America, Inc v. Yechezkal Evan Spero*, IPR2023-01320 (IPR of U.S. Patent 10,894,503, pending).

**C. Lead and Back-Up Counsel - 37 C.F.R. § 42.8(b)(3) –
Lead and Back-Up Counsel remain unchanged however,
mailing address is updated as follows:**

Lead Counsel	Back-Up Counsel
Sangeeta G. Shah (Reg. No. 38,614) BROOKS KUSHMAN P.C. 150 W. Second Street, Suite 400N Royal Oak, MI 48067-3496 Telephone (248) 358-4400 Facsimile (248) 358-3351	David S. Bir (Reg. No. 38,383) Bernard P. Tomsa (Reg. No. 60,121) BROOKS KUSHMAN P.C. 150 W. Second Street, Suite 400N Royal Oak, MI 48067-3846 Telephone (248) 358-4400 Facsimile (248) 358-3351

**D. Service Information - 37 C.F.R. § 42.8(b)(4) -
Unchanged**

Respectfully submitted,

Dated: January 3, 2024

/ Sangeeta G. Shah /
Sangeeta G. Shah (Reg. No. 38,614)
David S. Bir (Reg. No. 38,383)
Bernard P. Tomsa (Reg. No. 60,121)
BROOKS KUSHMAN P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067-3846
(248) 358-4400

Attorneys for Patent Owner

Certificate of Service

The undersigned hereby certifies that on January 3, 2024, 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:

Lead Counsel	Back-Up Counsel
Celine Crowson (Reg. No. 40,357) Hogan Lovells US LLP 555 13 th Street, N.W. Washington D.C., 20004 Telephone: (202) 637-5600 Facsimile: (202) 637-5910 celine.crowson@hoganlovells.com	Joseph Raffeto (Reg. No. 66,218) Ryan Stephenson (Reg. No. 68,385) Scott Hughes (Reg. No. 76,608) Hogan Lovells US LLP 555 13 th Street, N.W. Washington D.C., 20004 Telephone: (202) 637-5600 Facsimile: (202) 637-5910 joseph.raffetto@hoganlovells.com ; ryan.stephenson@hoganlovells.com scott.hughes@hoganlovells.com

Respectfully submitted,

/Sangeeta G. Shah /
Sangeeta G. Shah (Reg. No. 38,614)
David S. Bir (Reg. No. 38,383)
Bernard P. Tomsa (Reg. No. 60,121)
BROOKS KUSHMAN P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067-3846
(248) 358-4400

Attorneys for Patent Owner