

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.: IPR2023-01040

PATENT OWNER'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*, IPR2023-01039 (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 9,955,551, 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*, IPR2023-01321 (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:**

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

Respectfully submitted,

Dated: January 3, 2024

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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:

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