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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BRYCER, LLC, and BRYCER MANAGEMENT, INC.,

Petitioners

v.

TEGRIS, INC.,

Patent Owner.

Case No. IPR2023-01196

Patent No. 11,126,966

March 12, 2024

11:30 a.m. ET

Teleconference for PO Motion for Discovery

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1 ADMINISTRATIVE PATENT JUDGE: We're having
2 a conference here on the request to permit the
3 filing of a motion for discovery for the Patent
4 Owner. The request is a permission for certain
5 documents from -- and they're listed in a
6 document that was attached to an e-mail. There
7 were four sets of documents that the Patent
8 Owner wanted produced.

9 But before we proceed, Patent Owner, what
10 is this request under? Is that a request for
11 routine or for additional discovery?

12 MR. PERQUE: Additional discovery.

13 ADMINISTRATIVE PATENT JUDGE: Very good.
14 Go ahead and speak to your request.

15 MR. PERQUE: Request numbers one through
16 three are directed towards a single product,
17 The Compliance Engine, that's a Petitioner's
18 product. And it's directed to annual revenue
19 and subscription of numbers for that particular
20 product.

21 Then, request number four is directed
22 toward copying, and I'll get into that in more
23 detail.

24 After the institution of this proceeding,
25 parties had a few weeks discussing settlement

1 and the Patent Owner served the discovery
2 request shortly after those initial discussions
3 were had. The parties conferred regarding the
4 request and the Petitioner's objected to all
5 their requests.

6 The invention at issue as recited in
7 claims 8 through 16, which are the challenged
8 claims, and the institution was based on
9 obviousness.

10 Requests one through three are directed
11 toward commercial success.

12 Request number four is directed toward
13 copying.

14 There is a co-pending litigation.
15 However, that litigation has been stayed, so
16 the discovery sought here is not available in
17 the litigation. And the parties to this IPR
18 proceeding are private entities so that the
19 information that's sought by the Patent Owner
20 here regarding Brycer's annual revenues, et
21 cetera, are not otherwise available other than
22 through Brycer.

23 The invention at issue is recited in claim
24 eight, which is the independent claim of the
25 challenged claims. And it's a method claim

1 that relates to software and a web registry
2 that's used to enhance compliance of various
3 assets including fire hydrants and related
4 life-saving systems. And the regulatory
5 authority over those assets is typically a fire
6 marshal, but in certain jurisdictions it may
7 vary. The old way of doing it was the fire
8 marshal would send out handwritten -- not
9 handwritten -- but written notices and would
10 receive back reports from inspection companies
11 which may be in various formats, handwritten,
12 typewritten, sent by email, facsimile, et
13 cetera, and they weren't in a uniform format.
14 What's recited in the claim is a more proactive
15 process where the software in conjunction with
16 the web registry analyzes the information on
17 the assets in the web registry, identifies an
18 inspection that's upcoming, and then sends
19 notices to all of the interested parties.

20 The interested parties here are the
21 regulatory authority, the owner of the assets,
22 and the inspection companies which we'll get to
23 in a second.

24 The notice that goes to the asset owner
25 not only notifies them that there's a need for

1 an inspection, but it also tells them the type
2 of inspection, and also the inspectors that may
3 be available to perform the inspection. Once
4 they select the inspection company, that
5 inspection company receives from the system
6 notification that there's a certain asset that
7 needs to be inspected, the type of asset to be
8 inspected, and a form for doing this. Once the
9 inspection is done, the inspection company can
10 upload that form into the system. And what
11 this does is it takes all of the notification
12 and inspection aspects of compliance and
13 automates it so that the regulatory authority
14 can focus on the owners or the assets that are
15 noncompliant or where there's an owner that's
16 failed to perform inspections after receiving a
17 certain number of notices.

18 All of this is recited in the claims
19 themselves. And what Tegriss did when they
20 launched their system that implements this
21 patented process, they did case studies. And
22 what they found was the proactive noticing and
23 the forms of the standardized form for the
24 inspectors to respond to an inspection and
25 where that's all uploaded in real time to a web

1 registry. They found that within a year of
2 implementing their system, compliance improved
3 by 100 percent. The number of deficient
4 systems dropped by 300 percent. The number of
5 systems being inspected improved by 250
6 percent. The amount of time for the regulatory
7 authority to perform its compliance function in
8 many cases dropped by over 50 percent. All of
9 these better-than-expected results led to the
10 commercial success, not only for Tegriss, but
11 also for Brycer, the Petitioner.

12 So the requests one through three seek
13 their annual revenues, annual subscriptions to
14 show that with their entry to the market they
15 achieved enormous success. And we believe
16 there's a nexus, and we'll prove that there's a
17 nexus between that success and the proactive
18 notification, and standardized form, and web
19 registry that's recited in claim 8.

20 We believe that we were given leads about
21 it, so we can include materials from Brycer's
22 website which supports that. We also have
23 declarants that can provide additional support.
24 and also, the pending co-pending litigation is
25 a patent case and there's a claim chart that

1 was filed with the patent case that shows each
2 aspect of The Compliance Engine system that I
3 referred to earlier that corresponds to the
4 steps or features of claim 8 that are the
5 driving force, if you will, the nexus for the
6 commercial success.

7 Turning to the Garmin factors briefly, the
8 request -- we believe the requests are based on
9 more than a mere possibility of finding
10 something useful. None of the requests seek
11 the litigation provisions of the other party.
12 The information that we're seeking is not
13 available through any other means because
14 Brycer is a private company. The requests are
15 easily understandable and they've not overly
16 burdensome to answer.

17 Requests one through three are just
18 seeking annual numbers that should be in their
19 annual financial reports as well as readily
20 available from The Compliance Engine itself.

21 Request number four, which is directed to
22 copies, when we had our initial conference, the
23 Petitioners were not inclined to discuss each
24 request and the Patent Owner is willing. One
25 of the objections that was made was that

1 they're overly broad. With regard to requests
2 for copying are evidence of copying. The
3 Patent Owner is willing to limit that to
4 documents that refer to Tegrís or the patent
5 entity and The Compliance Engine to further
6 narrow the request to address any concerns
7 regarding the request being unduly burdensome.

8 We just direct the Judge's attention to a
9 similar case, Brunswick versus Volvo Penta, IPR
10 2020-01512, paper 25, I believe it's instructed
11 because in that instance under very similar
12 circumstances, the board allowed discovery
13 regarding the revenues annual number showing
14 the commercial success of the Petitioner, and
15 also allowed similar discovery showing copies.

16 In this instance, we believe that we can
17 submit declarations based on facts that are
18 also alleged in the corresponding litigation
19 that Brycer had access to and knowledge of the
20 Tegrís system before, and during, and after
21 their launch of The Compliance Engine and then
22 finally to -- in an effort to avoid the motion
23 you've granted from impacting the schedule of
24 this proceeding, the Patent Owner would be
25 willing to file and commit to filing its motion

1 within a week of the leads being granted and
2 should be able to make its case within a
3 ten-page limit.

4 ADMINISTRATIVE PATENT JUDGE: Thank you,
5 Counsel.

6 I want to get something clarified because
7 we're dealing with a patentability issue here
8 rather than litigation. So what exactly would
9 the documents have in terms of resolving the
10 patentability dispute?

11 MR. PERQUE: Well, the patentability issue
12 here is we believe the commercial success of
13 the Brycer product is directly related its
14 implementation of the claimed invention that's
15 recited in claim 8, and that commercial success
16 is an indicia of non --

17 ADMINISTRATIVE PATENT JUDGE: Thank you,
18 Counsel.

19 Petitioner, how do you respond?

20 MR. COLSHER: Good morning, Your Honor.
21 This is Patrick Colsher for Petitioners.

22 We would respectfully submit that Patent
23 Owner cannot under the Garmin factors meet its
24 burden to show that any requests are in the
25 interest of justice. At its core here, the

1 discovery here is analogous to the discovery
2 denied in the board's precedential Garmin
3 decision as well as numerous cases after.

4 What Patent Owner is really seeking is
5 discovery on Petitioner's business as well as
6 anything and everything that Petitioner may
7 have said over more than a decade about Patent
8 Owner's products or the challenged patent.

9 We would submit that there's nothing that
10 ties requests to the specific issues in this
11 proceeding and it's simply a fishing expedition
12 in the hopes that something may be uncovered.

13 We'd also submit that it's noteworthy that
14 in Patent Owner's recitation here, there isn't
15 really any evidence that would tie this to
16 commercial success or copying. These are broad
17 requests. You heard Patent Owner talk about
18 apparently a narrow nexus, which we hadn't
19 heard before, about notification standardized
20 forms. But the problem here is requests one
21 through three aren't seeking information about
22 a particular feature or anything else like
23 that.

24 We also heard Patent Owner talk about fire
25 hydrants, but the accused product isn't just

1 fire hydrants, it's elevators, backflow tests,
2 and other types of fire protection systems, and
3 we're just not sure how these requests, even if
4 granted, would go to things like commercial
5 success.

6 And as to request number four, which
7 Patent Owner has said they're talking about
8 copying, they're asking for anything and
9 everything that's ever been said about a
10 competitor. And we just don't see how that
11 could possibly reasonable in this circumstance.
12 The same thing is true for products. The same
13 thing is true for the patent in general.

14 As to the case that they brought up, we
15 had asked Patent Owner if they had any cases
16 before and we weren't provided that. And
17 certainly is briefing was allowed, we would
18 address that.

19 It appears here to us that Patent Owner's
20 theory is basically that discovery on secondary
21 consideration should be allowed and should be
22 allowed in basically all instances. That's a
23 position that was rejected in Garmin. That's a
24 position that's been rejected in many cases
25 since. And so, we would submit that there can

1 be no showing of interest in justice. The
2 briefing should be denied.

3 I would just make one final point on the
4 briefing. I'm sure the parties can work out a
5 schedule, but we're not too far out from the
6 Patent Owner response if these requests are
7 granted. We do have to work through the
8 schedule. I have no doubt that we could work
9 that out amongst ourselves.

10 Thank you, Your Honor.

11 ADMINISTRATIVE PATENT JUDGE: Thank you,
12 Counsel.

13 I have a question for you, Patent Owner.
14 You say here in number 4 documents that contain
15 statements of facts or opinions about Tegriss,
16 Tegriss Fire Compliance Law or U.S. Patent
17 11,126,966.

18 That seems like a very broad request here.
19 How do you know any of these documents of
20 opinions exist?

21 MR. PERQUE: Your Honor, two things. One
22 is we have expressed a willingness to limit the
23 request, only documents that refer to either
24 the challenge at R. Tegriss and Brycer System
25 called the compliance model. We believe that

1 they exist because Brycer had knowledge of the
2 Tegriss system before their system was
3 developed. And we also believe that there was
4 copying likelihood of documented evincing that
5 copying because we will submit a declaration
6 from individuals who have used both systems and
7 can attest that the Brycer system works in
8 almost precisely the same manner as the Tegriss
9 system as it relates to the features that are
10 recited in the challenged claims, which we have
11 also asserted and believe that there's a nexus
12 between those features and the commercial
13 success of the Brycer product, which is also,
14 Your Honor, represented on their website. They
15 refer not to the claim 8 but to the
16 functionality that's recited in claim 8 on the
17 very front pages of their website and attest
18 that their system achieves compliance of over
19 70 percent.

20 MR. COLSHER: Under documents about the
21 patent copying position.

22 MR. PERQUE: Well, Your Honor, it's
23 difficult to state in the -- in a vacuum. But
24 to the extent that there are documents that
25 were developed by Brycer at the time that they

1 were either developing or adding functionality
2 to The Compliance Engine and they refer to
3 certain aspects of the Tegriss system that are
4 helpful in achieving better compliance, or
5 helpful in other ways that will make their
6 product more commercially successful, we think
7 that the copying and the documents discussing
8 or providing an opinion regarding the Tegriss
9 system and how that may benefit Brycer if those
10 functionalities are included in its system,
11 would not only show copying but also further
12 support the commercial success case that's
13 asserted by Patent Owner.

14 ADMINISTRATIVE PATENT JUDGE: Thank you,
15 Counsel.

16 Any other comments from petitioner?

17 MR. COLSHER: No, Your Honor.

18 ADMINISTRATIVE PATENT JUDGE: Let me put
19 you all on mute here. I want to talk to my
20 colleague.

21 (Whereupon, a short recess was
22 taken.)

23 I'm back.

24 Thank you, Counsel, for all your comments.
25 We decided not to issue a decision on the

1 request at this time. I'm going to discuss the
2 request among ourselves and issue an order
3 soon.

4 So to that end to expedite matters, I
5 would like Patent Owners to submit the
6 transcript as soon as it's available -- the
7 sooner the better -- so we can decide on the
8 request.

9 Any other comments from Patent Owner?

10 MR. PERQUE: No, Your Honor.

11 ADMINISTRATIVE PATENT JUDGE: Anything
12 from Petitioner?

13 MR. COLSHER: No, Your Honor. Thank you
14 for your time today.

15 ADMINISTRATIVE PATENT JUDGE: We're
16 adjourned, and have a nice day.

17 (Meeting adjourned. Time noted:
18 11:52 a.m. ET)

C E R T I F I C A T I O N

I, ESTAMARIE CASTELLI-VELEZ, a Shorthand Reporter and Notary Public within and for the State of New York, do hereby certify the foregoing to be a true and accurate transcript to the best of my knowledge and ability.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

Date: 3/14/2024

A handwritten signature in cursive script, reading "Estamarie Castelli-Velez", is written over a horizontal line.

ESTAMARIE CASTELLI-VELEZ

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