UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner

v.

GEOSCOPE TECHNOLOGIES PTE. LTD,

Patent Owner.

CASE: IPR2023-01209

U.S. Patent No. 7,561,104

PATENT OWNER'S AUTHORIZED UNOPPOSED MOTION TO SUBMIT PETITIONER CLAIM CONSTRUCTION BRIEF AS EXHIBIT

I. RELIEF REQUESTED

Pursuant to the Board's email authorization on October 22, 2024, Patent Owner Geoscope seeks to enter Petitioner Google's Opening Claim Construction Brief as an exhibit in IPR2023-01209 and related IPR2023-01211. Petitioner does not oppose Patent Owner's motion.

Petitioner's District Court Opening Claim Construction Brief has been entered as Exhibit 1025 in related IPRs IPR2023-01210, IPR2023-01212, and IPR2023-01213. IPR2023-01210 and IPR2023-01212 contain substantially the same issues and arguments as IPR2023-01209 and IPR2023-01211, and both Parties have requested a consolidated oral argument for IPR2023-01209, -01210, -01211 and -01212. *See* Papers 36 and 37.

Further, as Petitioner's Opening Claim Construction Brief is a publicly-available exhibit in IPR2023-01210, -01212 and -01213, the Board can and should take judicial notice of Petitioner's Opening Claim Construction Brief. *See, e.g., Mobility Workx, LLC v. Unified Patents,* LLC, 15 F.4th 1146, 1151-1152 (Fed. Cir. 2021) (taking judicial notice of "various [USPTO] agency documents"); *Kaempe v. Myers*, 367 F.3d 958, 965 (D.C. Cir. 2004) (determining that USPTO documents were "public records subject to judicial notice."); Fed. R. Evid. 201(b). Inclusion of Petitioner's Opening Claim Construction Brief as an exhibit in IPR2023-01209 and IPR2023-01211 will result in a more complete

record and potentially avoid inconsistency and confusion across these IPRs and any appeals.

Finally, to the extent the Board is unable to grant this motion prior to Patent Owner filing its Sur-Replies on October 23, 2024, Patent Owner requests permission to file amended Sur-Replies in IPR2023-01209 and IPR2023-01211 solely to update citations to the new exhibit.

II. CONCLUSION

For the reasons stated above, Patent Owner respectfully requests that the Board grant Patent Owner's unopposed motion, allowing Patent Owner to file Petitioner's Opening Claim Construction Brief as an exhibit in this IPR.

Date: October 23, 2024

Respectfully submitted,

/s/ Stephen McBride /

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S MOTION TO SUBMIT PETITIONER CLAIM CONSTRUCTION BRIEF AS EXHIBIT

The names and email address of the parties being served are as follows:

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