

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

COLGATE-PALMOLIVE COMPANY,  
Petitioner,

v.

NOBLE INNOVATIONS NC L.L.C.,  
Patent Owner

---

IPR2023-01254  
U.S. Patent No. 8,881,332

---

---

**PETITIONER'S UPDATED MANDATORY NOTICES**

Pursuant to 37 C.F.R. § 42.8, Petitioner Colgate-Palmolive Company hereby submits the following updated mandatory notices in connection with its Petition for *Inter Partes* Review of U.S. Patent No. 8,881,332, Case No. IPR2023-01254.

**A. Real Parties-in-Interest**

Colgate-Palmolive Company (Petitioner);

Walmart Inc. (co-defendant in underlying district court case); and

Target Corporation (co-defendant in underlying district court case).

**B. Related Matters**

As of the filing date of the Petition, the '332 Patent has been asserted in *Noble Innovations NC L.L.C. v. Colgate-Palmolive Company, et al.*, Case No. 8:22-cv-03373-PX (D. Md.) (filed December 30, 2022). Ex. 1005, pp. 2, 7, 10.

The '332 Patent is related to U.S. Application No. 11/840,627 and to U.S. Patent No. 9,808,077. The '332 Patent issued from U.S. Patent No. 12/101,446, which is a continuation-in-part of, and claims priority to, U.S. Application No. 11/840,627. U.S. Patent No. 9,808,077 issued from U.S. Patent Application No. 14/535,442, which was filed as a continuation of the '332 Patent application.

### **C. Counsel**

#### Lead Counsel

Keith D. Harden  
Reg. No. 74,472  
MUNCK WILSON MANDALA, LLP  
12770 Coit Road, Suite 600  
Dallas, Texas 75251  
[kharden@munckwilson.com](mailto:kharden@munckwilson.com)  
T: 972.628.3600  
F: 972.628.3616

#### Backup Counsel

Daniel E. Venglarik  
Reg. No. 39,409  
MUNCK WILSON MANDALA, LLP  
12770 Coit Road, Suite 600  
Dallas, Texas 75251  
[dvenglarik@munckwilson.com](mailto:dvenglarik@munckwilson.com)  
T: 972.628.3600  
F: 972.628.3616

#### Backup Counsel

Michael C. Wilson  
Texas Bar No. 21704590  
(admitted *pro hac vice*)  
MUNCK WILSON MANDALA, LLP  
12770 Coit Road, Suite 600  
Dallas, Texas 75251  
[mwilson@munckwilson.com](mailto:mwilson@munckwilson.com)  
T: 972.628.3600  
F: 972.628.3616

#### Backup Counsel

Jared M. Hoggan  
Texas Bar No. 24065435  
(admitted *pro hac vice*)  
MUNCK WILSON MANDALA, LLP  
12770 Coit Road, Suite 600  
Dallas, Texas 75251  
[jhoggan@munckwilson.com](mailto:jhoggan@munckwilson.com)  
T: 972.628.3600  
F: 972.628.3616

A power of attorney under 37 C.F.R. § 42.10(b) was previously filed.

### **D. Service Information**

Petitioner consents to electronic service at the above designated Counsel email addresses and at the following email address:

[InternalColgate-Noble@munckwilson.com](mailto:InternalColgate-Noble@munckwilson.com).

Service of any documents via post or hand-delivery may be made at: Munck Wilson Mandala LLP, 12770 Coit Road, Suite 600, Dallas, TX 75251; Telephone: (972) 628-3600; Facsimile: (972) 628-3616.

Dated: April 12, 2024

Respectfully submitted,

By: /Keith D. Harden/  
Keith D. Harden  
Registration No. 74,472

## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that a copy of the foregoing PETITIONER’S UPDATED MANDATORY NOTICES was served on April 12, 2024 by electronic mail on the following counsel for Patent Owner:

Kendal Sheets      [ksheets@whitestone.law](mailto:ksheets@whitestone.law); [litigation@whitestone.law](mailto:litigation@whitestone.law)

Weir L. King      [wking@whitestone.law](mailto:wking@whitestone.law)

WHITESTONE LAW  
1850 Towers Crescent Plaza, Suite 550  
Tysons, VA 22182

Dated: April 12, 2024

/Keith D. Harden/  
Keith D. Harden  
Registration No. 74,472