

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WENZHOU XIN XIN SANITARY WARE CO., LTD.,
Petitioner

v.

DELTA FAUCET COMPANY.
Patent Owner

Case No.: IPR2023-01332
U.S. Patent No. 11,473,277

PATENT OWNER'S MANDATORY NOTICES

I. MANDATORY NOTICES - 37 C.F.R § 42.8(a)(2)

Delta Faucet Company submits the following Mandatory Notices:

A. Real Party in Interest (37 C.F.R. § 42.8(b)(1))

The real party in interest is Delta Faucet Company, the owner of U.S. Patent No. 11,473,277. Delta Faucet Company is a wholly owned subsidiary of Masco Corporation of Indiana. Masco Corporation, a publicly traded company, owns 90% of Masco Corporation of Indiana.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

Without conceding that the following matters would affect, or be affected by, a decision in the present *Inter Partes* review, Patent Owner discloses the following judicial and administrative matters out of an abundance of caution:

i. Litigation

Wenzhou Xin Xin Sanitary Ware Co., Ltd. v. Delta Faucet Company, District of New Jersey, Civil Action No. 2:23-cv-02038-ES-AME

ii. Patents/Applications

U.S. Application No. 18/233,846 filed 08/14/2023, is a continuation of U.S. Application No. 17/890,526 filed August 18, 2022, now U.S. Patent No. 11,725,369, which application is a continuation of U.S. Application No. 17/167,467 filed 02/04/2021, now U.S. Patent No. 11,473,277.

C. **Lead and Backup Counsel (37 C.F.R. § 42.8(b)(3))**

Patent Owner provides the following designation of counsel:

Lead Counsel	Backup Counsel
George D. Moustakas HARNESS, DICKY & PIERCE P.L.C. 5445 Corporate Dr., Suite 200 Troy, MI 48098 Phone: 248-641-1600 Fax: 248-641-0270 email: gdmoustakas@hdp.com USPTO Reg. No. 44,425	David P. Utykanski HARNESS DICKY & PIERCE, P.L.C. 5445 Corporate Dr., Suite 200 Troy, MI 48098 Phone: 248-641-1600 Fax: 248-641-0270 email: davidu@hdp.com USPTO Reg. No. 39,052

A power of attorney is filed concurrently with these mandatory notices in compliance with 37 C.F.R. § 42.10(b).

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

Service address:

HARNESS, DICKY & PIERCE, P.L.C.
5445 Corporate Drive, Suite 200
Troy, MI 48098

Please send all correspondence to the lead and back-up counsel at the addresses shown above. Patent Owner consents to electronic service by email at the following addresses: gdmoustakas@hdp.com, davidu@hdp.com

Dated: September 6, 2023

Respectfully submitted,

/ George D. Moustakas /
GEORGE D. MOUSTAKAS
DAVID P. UTYKANSKI
HARNESS DICKY & PIERCE, P.L.C.
5445 Corporate Drive, Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270
gdmoustakas@harnessip.com
davidu@harnessip.com

Attorneys for Delta Faucet Company

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e)(4), that service of the foregoing MANDATORY NOTICES BY PATENT OWNER and POWER OF ATTORNEY FOR PATENT OWNER, was made on the Petitioner as detailed below.

Timothy T. Wang, Reg. No. 61,554
Nicholas Najera, Reg. No. 81,833
Ni, Wang & Massand, PLLC
8140 Walnut Hill Ln., Ste. 615
Dallas, TX 75081
twang@nilawfirm.com; nnajera@nilawfirm.com

Dated: September 6, 2023

/ George D. Moustakas /

GEORGE D. MOUSTAKAS
DAVID P. UTYKANSKI
HARNESS DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Suite 200
Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270
gdmoustakas@hdp.com
davidu@hdp.com

Attorneys for Delta Faucet Company