

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DEFI EDUCATION FUND

Petitioner

v.

TRUE RETURN SYSTEMS, LLC

Patent Owner

Case IPR2023-01388

U.S. Patent No. 10,025,797

RESPONSE BY PATENT OWNER TO ORDER TO SHOW CAUSE

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

True Return Systems LLC (“Patent Owner” or “True Return”) submits this Response to the Board’s January 25, 2024 Order to Show Cause (“Order,” Paper 9). By the Order, the Board required clarification of the role in this proceeding of Jack Fonss, the inventor of U.S. Patent No. 10,025,797 and the sole owner of True Return. Patent Owner confirms that it will not be represented by Mr. Fonss in this proceeding.

With respect to the designation of backup counsel pursuant to 37 C.F.R. § 42.10, Patent Owner respectfully requests an extension of time for compliance. As discussed in the January 31, 2024 Declaration of Jack Fonss (EX3100), various threats have been made against Mr. Fonss related to the ‘797 Patent that have necessitated the involvement of law enforcement, impairing Patent Owner’s ability to enlist willing backup counsel. Accordingly, Patent Owner requests an additional 30 days to make a designation of backup counsel.

Dated: February 5, 2024

Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing RESPONSE BY PATENT OWNER TO ORDER TO SHOW CAUSE was served on February 5, 2024 by filing documents through the Patent Trial and Appeal Case Tracking System (P-TACTS) and courtesy copies were also served via electronic mail on the following:

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