

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AFFORDABLE WIRE MANAGEMENT, LLC,
Petitioner,

v.

CAMBRIA COUNTY ASSOCIATION FOR THE BLIND AND
HANDICAPPED, INC.,
Patent Owner.

IPR2024-00182
Patent 11,349,291 B2

**PATENT OWNER'S MANDATORY NOTICES
UNDER 37 C.F.R. § 42.8**

Pursuant to 37 C.F.R. § 42.8, Patent Owner Cambria County Association for the Blind and Handicapped, Inc. (“Patent Owner”) submits the following Mandatory Notices in response to the Petition for *Inter Partes* Review, IPR2024-00182, challenging claims 1-23 of U.S. Patent No. 11,349,291 B1 (“ ‘291 Patent”).

A. Real Parties-In-Interest (37 C.F.R. § 42.8(b)(1))

For purposes of 35 U.S.C. § 312(a)(2) and 37 C.F.R. § 42.8(b)(1), Patent Owner identifies itself as the only real party-in-interest. Patent Owner is not controlled by any other entity.

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

The ‘291 Patent, together with U.S. Patent No. 10,177,551 (the “ ‘551 Patent”), currently are the subject of patent infringement litigation that Patent Owner has asserted against Petitioner in *Cambria County Association for the Blind and Handicapped, Inc. v. Affordable Wire Management, LLC*, No. 1:23-cv-00080 (D. Del.), filed on January 23, 2023. Petitioner has also filed a separate Petition for *Inter Partes* Review challenging the claims of the ‘291 Patent in IPR2024-00178. In addition to the multiple Petitions for *Inter Partes* Review challenging the claims of the ‘291 Patent, Petitioner has filed a Petition for *Inter Partes* Review challenging the claims of the ‘551 Patent in IPR2024-00139.

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

LEAD COUNSEL	BACKUP COUNSEL
Daniel J. Melman (Reg. No. 55,451) Eckert Seamans Cherin & Mellott LLC 10 Bank St. Suite 700 White Plains, NY 10606 Email: dmelman@eckertseamans.com Tel: 914.286.6447 Fax: 914.949.2909	Theodore Y. McDonough (Reg. No. 71,981) Eckert Seamans Cherin & Mellott LLC Gateway IV, Suite 401 100 Mulberry St. Newark, NJ 07102 Email: tmcdonough@eckertseamans.com Tel: 973.855.4724 Fax: 973.855.4701

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

Service of any documents via hand-delivery may be made at the postal mailing addresses of the respective lead and back-up counsel designated above.

Patent Owner consents to electronic service as follows:

ESCMCAB-AWM@eckertseamans.com

Dated: November 21, 2023

By: / Daniel J. Melman /
 Daniel J. Melman (Reg. No. 55,451)
 ECKERT SEAMANS CHERIN
 & MELLOTT LLC
 10 Bank St.
 Suite 700
 White Plains, NY 10606
 Email: dmelman@eckertseamans.com
 Phone: 914.286.6447
 Fax: 914.949.2909

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 21st day of November, 2023, a true and correct copy of the foregoing **Patent Owner's Mandatory Notices Under 37 C.F.R. § 42.8** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Serge Subach (Reg. No. 74,652)
SSubach@mintz.com; CAB_AWM@mintz.com
Williams S. Dixon (Reg. No. 78,346)
WSDixon@mintz.com; CAB_AWM@mintz.com
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C.
One Financial Center
Boston, Massachusetts 02111

Dated: November 21, 2023

/ Daniel J. Melman /
Daniel J. Melman (Reg. No. 55,451)