

From: [Jim Lennon](#)
To: [Director PTABDecision Review](#)
Cc: [McPherson, Patrick D.](#); [Muldoon, Patrick C.](#); [Powers, Joseph A.](#); [DJEnglish@duanemorris.com](#); [jimlyle@duanemorris.com](#); [ggardella@gardellagrace.com](#); [James Harris](#); [Jason Shapiro](#); [Timothy Devlin](#); [UMBRA-DLF Intl](#); [Jim Lennon](#)
Subject: IPR2024-00270: Document(s) Filed - CISCO SYSTEMS, INC. v. UMBRA TECHNOLOGIES LTD.; Request for Director Review - Institution Decision
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[2024-09-19 13 PO Request for Director Review in IPR2024-00270 \(US Pat. No. 11108595\).pdf](#)

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Dear Director Vidal,

Patent Owner in IPR2024-00270 respectfully requests Director Review of the Board Panel's decision to institute review.

In the decision, the Panel concluded that Petitioner had shown a reasonable likelihood that claims 15–20 of U.S. Patent No. 11,108,595 (the '595 patent) would have been obvious in view of certain references identified as "Hankins or Hankins and Kommula". (Dec. at 25.)

Patent Owner hereby provides the following issue for which Patent Owner seeks Director Review:

1. The Panel makes a critical error by conflating a request for "*services*" with a request for "*list*". The record shows that a general request for "*services*" from a server is not the same as a specific request for "*a list of available servers*". The Panel arrives at this erroneously conclusion by improperly relying upon the teachings of the '595 patent, itself, as a roadmap to the claimed invention.

The Petition fails to identify a teaching in the prior art showing that a request for "*services*" is the same as a request for "*a list of available servers*". This issue is dispositive, as all claims of the '595 patent require this element, which is absent from the prior art of record. Therefore, it is appropriate to vacate the decision, deny institution of trial, and terminate the proceeding.

For the reasons above, and further discussed in Patent Owner's Request for Director Review, Patent Owner respectfully requests that the Director review the decision and correct the errors therein.

Respectfully,

James M. Lennon

Backup Counsel for Patent Owner, UMBRA Technologies Ltd.



James M. Lennon ("Jim")
1526 Gilpin Ave.
Wilmington, DE 19806
Direct: (302) 449-7676
Cell: (302) 593-4486

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