

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DBR FINANCE, INC., Petitioner,

v.

RUGGED CROSS HUNTING BLINDS, LLC, Patent Owner

Case IPR 2024-00291

Patent 11,399,535

Issue Date: August 2, 2022

Title: CAMOUFLAGE MATERIAL, FOR A HUNTING BLIND

**JOINT MOTION TO EXTEND FILING DATES FOR PETITIONER'S
REPLY TO PATENT OWNER'S RESPONSE TO PETITION FOR *INTER
PARTES* REVIEW AND PATENT OWNER'S SUR-REPLY TO
PETITIONER'S RESPONSE TO PATENT OWNER'S RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW**

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The parties, Petitioner, DBR Finance, Inc. and Patent Owner, Rugged Cross Hunting Blinds, LLC, by and through their respective counsel, respectfully move this Board to extend the Due Dates currently in place by the Board's previously entered (Paper 15) Scheduling Order dated June 13, 2024, and in support of this motion state:

1. The Board's (Paper 15) Scheduling Order dated June 13, 2024 provides for the following dates:

DUE DATE 2 November 29, 2024
Petitioner's reply to Patent Owner's response to petition

DUE DATE 3 January 10, 2025
Patent Owner's sur-reply to reply

2. Due to unavoidable scheduling conflicts and Hurricane Milton which directly affected the offices and personal homes of counsel for the Patent Owner, it was necessary to reschedule Patent Owner's Expert, Dr. Kimberly Cameron until November 5-7, 2024.

3. The parties have further agreed to extend Due Date 2, Petitioner's reply to Patent Owner's response to petition from November 29, 2024, to and including December 13, 2024 due to the rescheduled deposition of Dr. Cameron which would then only allow for a shortened time period for Petitioner to prepare and file its reply.

4. Likewise, the parties have agreed to also extend Due Date 3, Patent Owner's sur-reply to reply based on the extension of Petitioner's reply from the current date of January 10, 2025, to and including January 24, 2025.

5. No other dates within the Scheduling Order will be affected by the extension of Due Date 2 and Due Date 3.

5. This agreed motion is made in good faith and not for the purposes of delay.

For the reasons set forth above, the parties hereto respectfully request this Board enter an Order granting an extension of Due Date 2, Petitioner's reply to Patent Owner's response to petition from November 29, 2024, to December 13, 2024 and Due Date 3, Patent Owner's sur-reply to reply from January 10, 2025 to January 24, 2025.

DATED this 24th day of October, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to 37 C.F.R. §§ 42.6(e) and 42.105, a true and correct copy of the foregoing was served via electronic mail to: Thomas G. Eschweiler, Esquire (teschweiler@epiplaw.com), Eschweiler & Potashnik, LLC, 195 S. Main Street, Suite 400, Akron, OH 44308 and Dennis J. Abdelnour, Esquire, Honigman LLP, 155 N. Wacker Drive, Suite 3100, Chicago, IL 60606 this 24th day of October, 2024.

/s/ Robert L. Wolter
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