

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

IPR2024-00511
Patent 9,319,852 B2

Before KEVIN C. TROCK, SCOTT RAEVSKY, and BRIAN P. MURPHY,
Administrative Patent Judges.

RAEVSKY, *Administrative Patent Judge.*

DECISION
Granting Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

Motorola Solutions, Inc. (“Petitioner”) filed a Petition requesting an *inter partes* review of claims 1–5 and 6–16 in U.S. Patent No. 9,319,852 B2 (Ex. 1001, “the ’852 patent”). Paper 3 (“Pet.”). STA Group, LLC (“Patent Owner”) filed a Preliminary Response. Paper 9 (“Prelim. Resp.”).

Under 35 U.S.C. § 314(a), an *inter partes* review may not be instituted unless it is determined that there is a reasonable likelihood that the petitioner would prevail with respect to at least one of the claims challenged in the petition. After considering the parties’ arguments and evidence, and for the reasons set forth below, Petitioner demonstrates a reasonable likelihood of prevailing with respect to at least one of the challenged claims of the ’949 patent. Accordingly, we institute an *inter partes* review with respect to all challenged claims and grounds asserted in the Petition. 37 C.F.R. § 42.108(a).

Our factual findings and conclusions at this stage of the proceeding are based on the evidentiary record developed thus far. This is not a final decision as to patentability of the challenged claims.

II. BACKGROUND

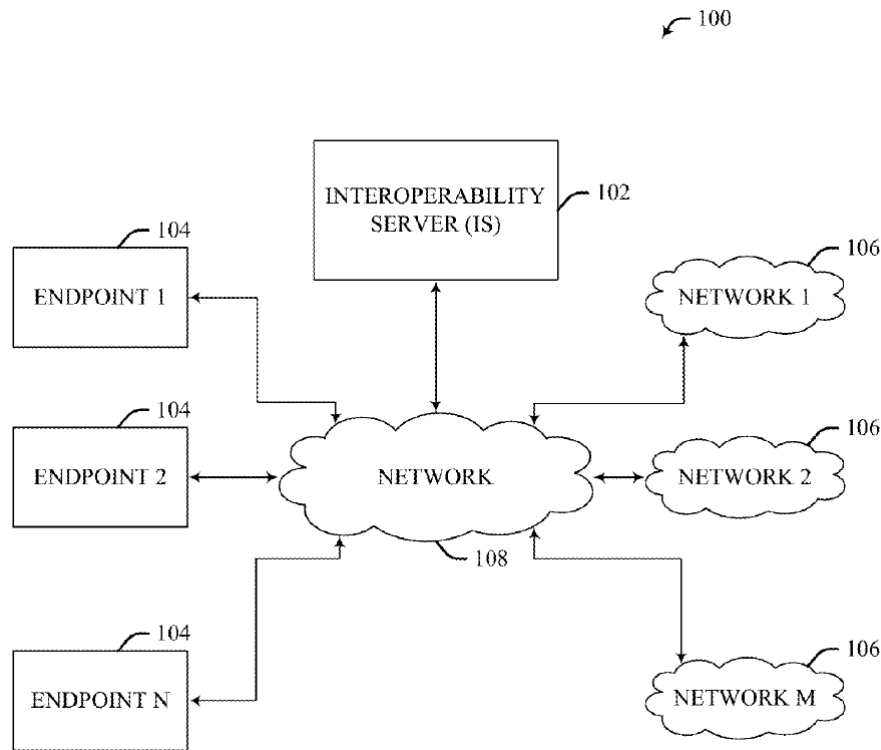
A. *Related Matters*

The parties identify the following related matters: *STA Group LLC v. Motorola Solutions, Inc.*, No. 2:23-cv-00030 (E.D. Tex, Jan. 26, 2023) and IPR2024-00479, filed concurrently on the ’852 patent. Pet. 86; Paper 4, 1.

B. *The ’852 patent*

The ’852 patent relates generally to facilitating communication between non-compatible communication devices by utilization of a dynamic

media proxy. Ex. 1001, code (57). Figure 1 illustrates a system 100 that can dynamically join various non-compatible communication systems into one cohesive infrastructure:



Ex. 1001, 4:46–49. System 100 depicts interoperability server (IS) 102, endpoints 104 and networks 106 that employ different technologies, and network 108. *Id.* at 4:49–55, 5:14–15. As an example, system 100 can allow users of two-way radios, often called push-to-talk (PTT) radios, and other voice devices, such as cell phones and regular telephones, to directly communicate. *Id.* at 4:49–52.

The IS 102 can facilitate communication between different non-compatible communication devices, such as endpoints 104. *Id.* at 4:56–58. IS 102 can connect two-way radios to other networks, for example, by employing IP (internet protocol) technology standards, and help extend their reach. *Id.* at 5:3–5. Thus, IS 102 can bring non-compatible communication

devices, such as push-to-talk radios, into a dynamic, real-time, and information-rich collaboration environment and can allow an entity to communicate with a PTT radio with another communication device. *Id.* at 5:5–10.

C. Challenged Claims

Claim 1 is illustrative of the challenged claims:¹

1. [1pre] An apparatus comprising a processor, wherein the processor is configured to:

[1a] identify information related to an endpoint to obtain identified information; and

[1b] negotiate a communication session with an interoperability server (IS) based in part on at least one of the identified information or a predefined floor control mechanism associated with the IS; and

[1c] receive a first determination from the IS that the endpoint is not in adherence with capabilities of the predefined floor control mechanism and that a proxy is to be dynamically inserted to connect the endpoint to a virtual talk group, wherein the capabilities comprise quality of service, rules of transmission and trusted endpoint identity.

Ex. 1001, 16:47–60.

¹ We use the same numbers and letters that Petitioner uses to identify the claim language. *See* Pet. xv (Claims Listing). These annotations do not impact our analysis.

D. Asserted Challenges to Patentability

Petitioner asserts the following challenges to patentability (Pet. 1):

Claim(s) Challenged	35 U.S.C. §²	Reference(s)/Basis
1–5, 7–16	103	Shaffer, ³ Keller ⁴
1, 2, 9–13	103	Chowdhury, ⁵ PoC Interworking Service, ⁶ PoC System Description, ⁷ TR23.979, ⁸ Jin ⁹
4, 5, 14, 16	103	Chowdhury, PoC Interworking Service, PoC System Description, TR23.979, Jin, TS23.060 ¹⁰

² The Leahy-Smith America Invents Act (“AIA”), Pub. L. No. 112-29, 125 Stat. 284, 285–88 (2011), revised 35 U.S.C. §§ 102, 103 effective March 16, 2013. The challenged patent claims priority to an application filed before March 16, 2013, so the pre-AIA version of § 103 presumptively applies. Ex. 1001, code (22). However, for reasons we explain below, Petitioner establishes a reasonable likelihood that the challenged claims are not entitled to priority. We therefore apply the AIA version of § 103 at this stage.

³ US Pub. No. 2009/0298525 A1, published Dec. 3, 2009 (Ex. 1016).

⁴ US Pub. No. 2004/0133683 A1, published July 8, 2004 (Ex. 1024).

⁵ US Pat. No. 7,774,012 B2, issued Aug. 10, 2010 (Ex. 1035).

⁶ *OMA PoC Interworking Service V2.0* (OMA-TS-PoC_Interworking_Service-V2_0) (Feb. 26, 2008) (Ex. 1032).

⁷ *OMA PoC System Description V2.0* (OMA-TS-PoC_System_Description-V2_0) (Feb. 26, 2008) (Ex. 1031).

⁸ *3GPP enablers for Open Mobile Alliance (OMA) Push-to-talk over Cellular (PoC) services* (3GPP TR23.979) V7.0.0 (June 2007) (Ex. 1033).

⁹ US Pub. No. 2006/0003781 A1, published Jan. 5, 2006 (Ex. 1036).

¹⁰ *3GPP General Packet Radio Service (GPRS) Description* (3GPP TS23.060) V8.0.0 (March 2008) (Ex. 1034).

To support these challenges, Petitioner relies on the declaration of Sayfe Kiaei, Ph.D. (Ex. 1002). Patent Owner has not submitted testimonial evidence.

IV. ANALYSIS

A. Legal Principles: Obviousness

“In an IPR, the petitioner has the burden from the onset to show with particularity why the patent it challenges is unpatentable.” *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1363 (Fed. Cir. 2016) (citing 35 U.S.C. § 312(a)(3) (requiring *inter partes* review petitions to identify “with particularity . . . the evidence that supports the grounds for the challenge to each claim”)).

A patent may not be obtained “if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” 35 U.S.C. § 103(a) (2006). An obviousness analysis involves underlying factual inquiries including (1) the scope and content of the prior art; (2) differences between the claimed invention and the prior art; (3) the level of ordinary skill in the art; and (4) where in evidence, objective indicia of nonobviousness, such as commercial success, long-felt but unsolved needs, and failure of others. *Graham v. John Deere Co.*, 383 U.S. 1, 17–18, 35–36 (1966). We analyze the obviousness issues according to these principles.

B. Level of Ordinary Skill in the Art

Petitioner asserts that a person of ordinary skill in the art (“POSITA”) would have had “at least a bachelors’ degree in electrical engineering,

computer science, or a similar field, plus approximately three years of industry in networking or communication systems, in particular address interoperability between different types of networks and satellite communications,” and that “[a]dditional education in the fields of electrical engineering or computer science, such as a masters or doctorate degree, could substitute for professional experience in the field.” Pet. 14–15. Petitioner adds that “[a] person with less or different education but more relevant practical experience, or vice versa, may also meet this standard.” *Id.* at 15.

Patent Owner does not dispute Petitioner’s proposal. Prelim. Resp. 7.

Based on the current record, we accept Petitioner’s description of an ordinarily skilled artisan as consistent with the ’852 patent and the asserted prior art.

C. Claim Construction

In *inter partes* review, we construe a claim using the same claim construction standard that would be used to construe the claim in a civil action under 35 U.S.C. § 282(b), including construing the claim in accordance with the ordinary and customary meaning of such claim as understood by one of ordinary skill in the art and the prosecution history pertaining to the patent. 37 C.F.R. § 42.100(b) (2022).

Petitioner proposes a construction for the “receiving” limitation, limitation [1c]. Pet. 16–18. Patent Owner asserts that no construction is necessary. Prelim. Resp. 7. Because no terms are disputed at this stage, we determine that no terms require construction. *See Realtime Data, LLC v. Iancu*, 912 F.3d 1368 (Fed. Cir. 2019) (“The Board is required to construe ‘only those terms . . . that are in controversy, and only to the extent

necessary to resolve the controversy.’” (quoting *Vivid Techs., Inc. v. Am. Sci. & Eng’g, Inc.*, 200 F.3d 795, 803 (Fed. Cir. 1999))). The parties are invited to propose any necessary claim constructions during trial.

D. Alleged Obviousness over Shaffer and Keller

Petitioner contends that claims 1–5 and 7–16 are unpatentable over Shaffer and Keller. *See* Pet. 33–57. Petitioner’s analysis hinges on whether the ’852 patent claims are entitled to priority to Shaffer, which is the parent patent to the ’852 patent. Pet. 5–14. We therefore begin our analysis by reviewing the parties’ arguments regarding priority.

1. Priority

Petitioner asserts that the ’852 patent is not entitled to priority to Shaffer because limitation [1c] (and a similar limitation in claims 8 and 12), which was added during prosecution of the ’852 patent, lacks written description. Pet. 5–14 (citing, e.g., Ex. 1003, 42, 46). Limitation [1c] states (emphasis added):

[1c] *receive a first determination* from the IS that the endpoint is not in adherence with capabilities of the predefined floor control mechanism and that a proxy is to be dynamically inserted to connect the endpoint to a virtual talk group, wherein the capabilities comprise quality of service, rules of transmission and trusted endpoint identity.

Petitioner contends there is no disclosure in the ’852 patent “that any device receives the first determination” in this limitation. *Id.* at 10.

Petitioner notes that during prosecution, the patentee indicated that support for adding limitation [1c] “may be found in FIG. 7 and the accompanying description from the specification, as well as paragraph [0034] of the specification.” *Id.* at 9 (citing Ex. 1003, 49). But according to Petitioner, Figure 7 “merely discloses a flow diagram for determining

whether a proxy should be inserted” and “paragraph 34 merely discloses that the IS can determine whether a proxy is necessary based on the information received from an initiating endpoint.” *Id.* at 10 (citing Ex. 1017, 13–14, 21–22, 40). Neither of these disclosures supports that any device receives a first determination, Petitioner contends. *Id.* Petitioner adds that there is also no inherent disclosure of “receiving a first determination” because “it is possible that neither the initiating nor the target endpoints are aware of the insertion of a proxy.” *Id.* at 11–12 (citing Ex. 1002 ¶ 69); *see also* Ex. 1025 ¶ 189 (“Transparent transcoding means . . . the PoC terminals and servers are not aware that transcoding is taking place” (cited in Ex. 1002 ¶ 69)).

After considering Patent Owner’s arguments, which we address below, we agree with Petitioner on this record that the ’852 patent claims lack priority to the parent application, Shaffer. For example, paragraph 34 of the ’299 application¹¹ resulting in the ’852 patent explains that “IS 102 (FIG. 1) can determine if the endpoint 104 adheres to the rules of transmission.” Ex. 1004 ¶ 34. This paragraph does not state that any other device (such as the endpoint itself) receives a determination from the IS that the endpoint does not adhere to the rules of transmission. Figure 7, reproduced below, is similarly devoid of any such description:

¹¹ U.S. App. No. 14/523,299 (Ex. 1004).

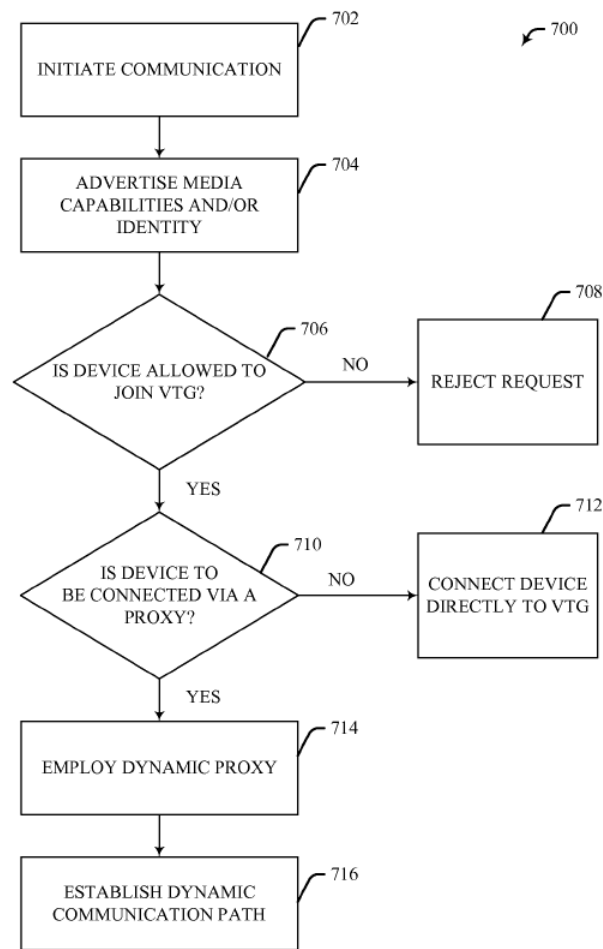


FIG. 7

The specification describes Figure 7 as “an example methodology that can facilitate dynamic communication between non-compatible communication devices.” Ex. 1004 ¶ 55. The specification further explains that “if the device demonstrates that it cannot comply with the behavioral characteristics of the interoperability system, the device can be attached to a VTG [virtual talk group] *via* a proxy,” in blocks 710 and 714 of Figure 7. *Id.* ¶ 56. But the ’299 application does not explain that this lack of compliance is communicated to any device, such as an endpoint.

Patent Owner first asserts that original claims 20 and 21 of Shaffer support limitation [1c]. Prelim. Resp. 17–18. We reproduce these claims below:

20. An apparatus, comprising:

an information determination component that identifies information related to an endpoint; and

a negotiation component that negotiates a communication session with an interoperability server (IS) based in part on at least one of the identified information or a predefined floor control mechanism associated with the IS.

21. The apparatus of claim 20, further comprising a capability determination component that identifies media capabilities associated with the endpoint, the media capabilities employed by the IS to dynamically determine if the endpoint should be connected to a virtual talk group (VTG) via a proxy.

Ex. 1003, 96. Patent Owner asserts that together, these claims “recite how an endpoint and an IS negotiate a communication session by determining capabilities associated with the endpoint,” and “[t]his includes the endpoint receiving a determination from the IS whether the endpoint is in adherence with capabilities of a predefined floor control mechanism.” Prelim. Resp. 17–18. We disagree. It is a logical leap to suggest that an IS determination of an endpoint’s capabilities necessarily includes communicating that determination to the endpoint or another device.¹²

Patent Owner next characterizes Shaffer as disclosing “a back-and-forth negotiation occurring between endpoints and interoperability servers,”

¹² Patent Owner also does not address *Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1349–50 (Fed. Cir. 2010) (*en banc*), which determined that in some cases, original claims themselves may lack written description support. *See id.* at 1349 (“Although many original claims will satisfy the written description requirement, certain claims may not.”).

asserting that “[t]his negotiation exchange includes communication related to the capabilities of the endpoint and IS.” *Id.* at 18–19 (citing, e.g., Ex. 1016, Fig. 6, ¶¶ 16, 25, 26, 29 34, 35, 53, 54).¹³ Patent Owner further asserts that “the endpoints and IS are in extensive, detailed communication, including communication regarding the capabilities of the endpoint” and that the IS will also “validate the endpoint identity as secured and/or trusted.” *Id.* at 20 (citing Ex. 1016 ¶ 38). None of the disclosures Patent Owner points to, however, disclose that any device “receive[s] a first determination from the IS that the endpoint is not in adherence with capabilities of the predefined floor control mechanism.” Disclosure of mere “capability negotiation,” validation, and “extensive, detailed communication” is not enough.

Patent Owner next asserts that “the exact terms appearing in the claim . . . need not be used in *haec verba*” to satisfy the written description requirement, and therefore support a claim of priority. *Id.* (quoting *Blue Calypso, LLC v. Groupon, Inc.*, 815 F.3d 1331, 1345 (Fed. Cir. 2016) (internal quotation omitted)). While this is a correct statement of the law, Patent Owner misunderstands its application by arguing that “it would have been predictable for those communications [between endpoints and IS] to include information from the IS, including any determinations made by the IS.” *Id.* at 21. Patent Owner’s assertion of predictability appears to argue that it would have been obvious to the skilled artisan that the “receiving”

¹³ Some confusion may arise because the parties are citing multiple versions of similar evidence, including Shaffer itself (Ex. 1016), the file history of the ’852 patent (Ex. 1003), the original application resulting in the ’852 patent (Ex. 1004), and the application resulting in the Shaffer patent (Ex. 1017). During trial, to the extent possible, the parties should strive to be more consistent in citing fewer similar documents.

limitation is disclosed. This argument is unpersuasive because it is well settled that a description that merely renders the invention obvious does not satisfy the written description requirement. *See Lockwood v. Am. Airlines, Inc.*, 107 F.3d 1565, 1572 (Fed. Cir. 1997) (“Although the exact terms need not be used *in haec verba*, . . . , the specification must contain an equivalent description of the claimed subject matter. A description which renders obvious the invention for which an earlier filing date is sought is not sufficient.”).

Petitioner therefore establishes a reasonable likelihood that the ’852 patent is not entitled to priority to Shaffer.¹⁴

2. Overview of Keller

Keller describes systems and methods for enabling a group directed session between at least two endpoints in a communications system. Ex. 1024 ¶ 6. Keller’s systems employ the Session Initiation Protocol (“SIP”), which Keller describes as an official standard used for signaling communications services on the Internet. *Id.* ¶¶ 7–8. SIP is a text-based signaling transactional protocol, similar to Hypertext Transfer Protocol (“HTTP”). *Id.* ¶ 8. SIP was designed for controlling media sessions and for

¹⁴ Petitioner also contends that the ’852 patent, and therefore Shaffer, lacks written description support for an endpoint that performs the claimed “identify information related to an endpoint” and “negotiate a communication session with the IS” limitations (i.e., limitations [1a] and [1b]). Pet. 12–13 (also referring to similar claims 8 and 12). Yet later, the Petition asserts that Shaffer discloses each of these limitations. *Id.* at 38–40, 52–57. On this record, these positions appear to be irreconcilable. Because Petitioner persuades us that limitation [1c] is likely not supported in Shaffer, we need not rely on Petitioner’s priority arguments for limitations [1a] and [1b] (and corresponding limitations in claims 8 and 12).

establishing media Sessions between an initiating endpoint and one recipient endpoint or a small group of recipient endpoints. *Id.* ¶ 9.

3. *Independent Claim 1*

Petitioner asserts that Shaffer discloses the preamble and all the limitations of claim 1 except limitation [1c], which is disclosed by the combination of Shaffer and Keller. *See* Pet. 33–47. At this stage, Patent Owner does not dispute any of these assertions, solely addressing the issue of priority as discussed above. Prelim. Resp. 16–21.

We agree with Petitioner, on this record, that Shaffer discloses the preamble (whether or not limiting) and limitations [1a] and [1b]. *See* Pet. 36–40. As Shaffer is the parent application of the '852 patent and is substantively identical to the '852 patent, we provide no further analysis of the preamble and these limitations at this stage.

For limitation [1c], Petitioner asserts that Shaffer discloses “a predefined floor control mechanism associated with the IS” and a “dynamic proxy component.” *Id.* at 40–41 (citing Ex. 1016 ¶¶ 34, 46). Shaffer also discloses the three recited capabilities of the predefined floor control mechanism, Petitioner asserts. *Id.* at 42–43 (citing, e.g., Ex. 1016 ¶¶ 19, 34, 39, 41, 56). Finally, Petitioner relies on Keller for informing the endpoint that it is not in adherence with the floor control mechanism, as Keller discloses:

The group entity might also detect that the terminal is unable to communicate with the floor controller 230. In this case, the group entity would preferably generate signaling to the non-dispatch endpoint to cause the endpoint to direct its media to the media manager, which would preferably be configured to impose talker arbitrated floor control on a full duplex device, e.g., the non-dispatch endpoint. The media manager will

preferably generate floor requests to the floor controller when voice is sourced by the non-dispatch terminal. As an option, tones or other audio information could be sent out to the user if they attempt to speak when someone else has the floor to discourage them from speaking further.

Id. at 44 (quoting Ex. 1024 ¶ 121¹⁵).

Petitioner further argues that it would have been obvious to “receive a first determination from the IS . . . that a proxy is to be dynamically inserted to connect the endpoint to a virtual talk group” as follows:

A POSITA would also have known and/or it would have been obvious to a POSITA that the SIP message received by the endpoint after initiating a call to a VTG would include a “record-route” header, which lists each of the servers that the signal from the endpoint traverses when attempting to establish communication with the VTG The record-route header received by the endpoint would include an identification showing that the proxy server was added to the signal path. . . . Thus, the processor of the endpoint would be informed that a determination was made to insert the claimed proxy.

Id. at 45–47 (citing Ex. 1002 ¶¶ 173, 174–176; Ex. 1022, 190–195).

Petitioner also sets forth a rationale to combine Shaffer and Keller. *Id.* at 33–34. For example, Petitioner argues that Shaffer’s goal was to provide a way for incompatible endpoints to work using “standards-based IP technologies,” and Keller’s SIP protocol is an established “standards-based IP technolog[y]” for signaling in PTT. *Id.* at 33 (citing Ex. 1016 ¶ 2; Ex. 1002 ¶ 155). Petitioner asserts that a POSITA would have looked for an example of such a system, such as Keller’s SIP-based system, for a PTT system as in Shaffer. *Id.* at 33–34. Combining these systems therefore

¹⁵ This appears to be a typographical error, as Petitioner appears to be quoting Ex. 1024 ¶ 122.

“would have been seen by a POSITA as nothing more than a combination of known elements according to their established functions to achieve an expected result, and would been considered to constitute nothing more than a routine engineering task that was well within the skill level of a POSITA,” Petitioner argues. *Id.* at 34 (citing Ex. 1002 ¶ 155).

On this record, we agree with Petitioner that the combination of Shaffer and Keller discloses limitation [1c] and determine that Petitioner articulates a sufficient rationale to combine these references.

a. Summary as to Claim 1

For the above reasons, Petitioner has shown a reasonable likelihood that claim 1 would have been obvious over the combination of Shaffer and Keller.

4. Independent Claims 8 and 12

Petitioner raises similar arguments for claims 8 and 12 as for claim 1 and therefore also meets its institution burden for these claims. *See* Pet. 52–57; *see* Prelim. Resp. 16–21 (relying on claim 1 arguments).

5. Dependent Claims 2–5, 7, 9–11, and 13–16

We leave for trial the issue of whether dependent claims 2–5, 7, 9–11, and 13–16 would have been obvious over Shaffer and Keller. *See* Pet. 47–53, 57.

E. Additional Grounds

Petitioner also contends that claims 1, 2, and 9–13 are unpatentable over Chowdhury, PoC Interworking Service, PoC System Description, TR23.979, and Jin. *See* Pet. 58–81. Petitioner further contends that claims 4, 5, 14, and 16 would have been obvious over the combination of each of the foregoing references along with TS23.060. *Id.* at 81–84. Because

Petitioner has established a reasonable likelihood of prevailing on its challenge over Shaffer and Keller, we need not address these grounds in detail.

We do, however, address one issue raised by the parties. We note that for limitation [1c], Petitioner’s argument at this stage appears to be insufficient to establish obviousness. Petitioner contends that the combination of Chowdhury and PoC Interworking Services discloses limitation [1c], but Petitioner asserts only that Chowdhury discloses the claimed “rules of transmission.” *See* Pet. 73 (citing Ex. 1002 ¶ 231). As Patent Owner points out, Petitioner appears to provide no explanation for how the proposed combination discloses all three capabilities recited in limitation [1c], including “quality of service, rules of transmission and trusted endpoint entity.” Prelim. Resp. 23 (“[T]he Petition’s analysis of this limitation . . . includes one conclusory statement regarding ‘rules of transmission of the P2T network’ yet fails to address the other capabilities: quality of service and trusted endpoint identity.”).

Accordingly, Petitioner has not met its institution burden for these grounds. Nevertheless, in view of *SAS Institute Inc. v. Iancu*, 138 S. Ct. 1348, 1355 (2018), we institute on all claims and all grounds presented in the Petition. *See also* 37 C.F.R. § 42.108(a) (“When instituting inter partes review, the Board will authorize the review to proceed on all of the challenged claims and on all grounds of unpatentability asserted for each claim.”).¹⁶

¹⁶ Patent Owner also argues that the Petition’s inclusion of a Ground 1 that the Petition marks as “Reserved,” and which Petitioner explains is “the subject of IPR2024-00479,” is an improper incorporation by reference to

V. CONCLUSION

At this stage of the proceeding, we determine that Petitioner has demonstrated a reasonable likelihood of prevailing on its challenges as to at least one challenged claim. At this preliminary stage, we have not made a final determination as to the patentability of the challenged claims or any underlying factual and legal issues.

VI. ORDER

Accordingly, it is

ORDERED that, pursuant to 35 U.S.C. § 314(a), an *inter partes* review of all challenged claims of the '852 patent is instituted with respect to all grounds of unpatentability set forth in the Petition; and

FURTHER ORDERED that pursuant to 35 U.S.C. § 314(c) and 37 C.F.R. § 42.4, notice is hereby given of the institution of a trial commencing on the entry date of this Decision.

Ground 1 in IPR2024-00479. Prelim. Resp. 11–16 (citing Pet. 1, 33). Patent Owner also notes that Petitioner submitted identical expert declarations in both proceedings. *Id.* at 12. We find Patent Owner's arguments unpersuasive. Petitioners in other proceedings have submitted a single, common declaration for multiple related proceedings. For clarity, however, we note that we have not considered here Petitioner's declarant's testimony regarding Ground 1 in IPR2024-00479.

IPR2024-00511
Patent 9,319,852 B2

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