

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS INC.,

Petitioner

v.

MONARCH NETWORKING SOLUTIONS LLC

Patent Owner

Case IPR2024-00565

Patent 8,451,845

**PATENT OWNER'S MOTION FOR ADVERSE
JUDGMENT**

Patent Owner's Exhibit List

Exhibit	Description
EX2001	Declaration of William Collier in Support of Motion for Admission <i>Pro Hac Vice</i>
EX2002	RFC 2893 – “Transition Mechanisms for IPv6 Hosts and Routers” (Aug. 2000), available at https://datatracker.ietf.org/doc/rfc2893/
EX2003	RFC 1918 – “Address Allocation for Private Internets” (Feb. 1996), available at https://datatracker.ietf.org/doc/rfc1918/
EX2004	<i>Reserved</i>
EX2005	Printout of https://www.ietf.org/staging/
EX2006	Printout of https://www.ietf.org/staging/draft-xli-ivi-00-7430-cancelled.txt
EX2007	Screenshot of Internet Archive history for https://www.ietf.org/ (2008 year selected), available at https://web.archive.org/web/20080801000000*/www.ietf.org
EX2008	Screenshot of Internet Archive history for https://www.ietf.org/staging/ , available at https://web.archive.org/web/20240000000000*/https://www.ietf.org/staging/
EX2009	2008 IEEE Global Telecommunications Conference Proceedings Title Page, available at https://ieeexplore.ieee.org/xpl/conhome/4697774/proceeding
EX2010	Screenshot of Internet Archive history for www3.ietf.org/proceedings/staging , available at https://web.archive.org/web/20080515000000*/www3.ietf.org/proceedings/staging
EX2011	June 13, 2008, Capture of http://www3.ietf.org/proceedings/ , available at https://web.archive.org/web/20080613195553/www3.ietf.org/proceedings/
EX2012	October 4, 2008, Capture of http://www3.ietf.org/proceedings/ , available at https://web.archive.org/web/20081004152450/www3.ietf.org/proceedings/
EX2013	RFC 1771 – “A Border Gateway Protocol 4 (BGP-4)” (Mar. 1995) available at https://datatracker.ietf.org/doc/rfc1771/
EX2014	RFC 2858 – “Multiprotocol Extensions for BGP-4” (June 2000) available at https://datatracker.ietf.org/doc/rfc2858/
EX2015	RFC 3031 – “Multiprotocol Label Switching Architecture” (Jan. 2011) available at https://datatracker.ietf.org/doc/rfc3031/
EX2016	Ex Parte Reexamination Certificate, U.S. Pat. No. 8,451,845 C1

Pursuant to 37 C.F.R. § 42.73(b) and the instructions from the Board, Patent Owner moves for adverse judgement. As a result of parallel *Ex Parte* Reexamination No. 90/019,246, the claims at issue in this *inter partes* review (Claims 1 and 5-8) have been cancelled. EX2016. When all claims at issue in an IPR are cancelled in a concurrent EPR, the Board “construe[s] [the] cancellation of all claims . . . as a request for adverse judgment.” *Mercedes-Benz USA, LLC v. Signal IP, Inc.*, IPR2015-00941, Paper 21 at 2-3 (PTAB Apr. 14, 2016). There are no outstanding challenges to be resolved in this *inter partes* review. Petitioner does not oppose this request.

Dated: December 20, 2024

Respectfully submitted,

By: / R. Allan Bullwinkel /
R. Allan Bullwinkel (Reg. No. 77,630)
Attorney for Patent Owner
Monarch Networking Solutions LLC

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **PATENT OWNER'S MOTION FOR ADVERSE JUDGMENT** was served on December 20, 2024 to the following lead and back-up counsel of record for Petitioner as follows:

Lead Counsel for Petitioner	
James M. Glass (Reg. No. 46,729) (Lead Counsel) Quinn Emanuel Urquhart & Sullivan, LLP 51 Madison Ave., 22nd Floor New York, New York 10010	Phone: 212-847-7000 Fax: 212-849-7100 jimglass@quinnemanuel.com
Back-Up Counsel for Petitioner	
Todd M. Briggs (Reg. No. 44,040) (Back-Up Counsel) Quinn Emanuel Urquhart & Sullivan, LLP 555 Twin Dolphin Drive, 5th Floor Redwood Shores, CA 94065	Phone: (650) 801-5000 Fax: (650) 801-5100 toddbriggs@quinnemanuel.com
Kevin Johnson (Reg. No. 38,927) (Back-Up Counsel) Quinn Emanuel Urquhart & Sullivan, LLP 555 Twin Dolphin Drive, 5th Floor Redwood Shores, CA 94065	Phone: (650) 801-5000 kevinjohnson@quinnemanuel.com
Nima Hefazi (Reg. No. 63,658) (Back-Up Counsel) Quinn Emanuel Urquhart & Sullivan, LLP 865 S Figueroa St 10th Floor, Los Angeles, CA 90017	Phone: (213) 443-3000 Fax: (213) 443-3100 nimahefazi@quinnemanuel.com

Dated: December 20, 2024

By: / R. Allan Bullwinkel /
R. Allan Bullwinkel (Reg. No. 77,630)
Attorney for Patent Owner
Monarch Networking Solutions LLC