

By: Jason M. Perilla (j.perilla@pkhip.com)
Kenneth A. Knox (k.knox@pkhip.com)
Eric G. Maurer (e.maurer@pkhip.com)
Thomas F. Finch (t.finch@pkhip.com)
PERILLA KNOX & HILDEBRANDT LLP
5871 Glenridge Drive
Suite 350
Atlanta, Georgia 30328-5376
Tel: (770) 927-7802
Fax: (877) 389-6779

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLUIDMASTER, INC.,
Petitioner,

v.

DANCO, INC.,
Patent Owner.

Case No. IPR2024-00635
U.S. Patent No. 10,934,698 B1

PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	LEGAL STANDARD.....	1
III.	ARGUMENT.....	2
A.	The Board’s conclusion that “overflow tube” is non-limiting is erroneous.	3
1.	Claim differentiation supports a conclusion that “overflow tube” is limiting.....	3
2.	The preambles of Claims 8 and 12 do not dictate the conclusion that “overflow tube” is non-limiting.	6
3.	The claimed “overflow tube” does not merely provide a “reference point.”	8
4.	The claimed “overflow tube” is limiting even if it is generic.	12
B.	The prior art does not disclose the “overflow tube” limitations.	13
IV.	CONCLUSION	14

TABLE OF AUTHORITIES

CASES

<i>Apple, Inc. v. Ameranth, Inc.</i> , 842 F.3d 1229 (Fed. Cir. 2016)	2
<i>Becton, Dickinson & Co. v. Tyco Healthcare Grp., LP</i> , 616 F.3d 1249 (Fed. Cir. 2010)	2
<i>Bicon, Inc. v. Straumann Co.</i> , 441 F.3d 945 (Fed. Cir. 2006)	2
<i>C.R. Bard, Inc. v. M3 Sys., Inc.</i> , 157 F.3d 1340 (Fed. Cir. 1998)	8, 9, 10
<i>Crystal Semiconductor Corp. v. TriTech Microelectronics. Int’l, Inc.</i> , 246 F.3d 1336 (Fed. Cir. 2001)	7
<i>Eko Brands, LLC v. Adrian Rivera Maynez Enters., Inc.</i> , 946 F.3d 1367 (Fed. Cir. 2020)	8, 9, 10, 11
<i>Johnson & Johnston Assocs. Inc. v. R.E. Serv. Co., Inc.</i> , 285 F.3d 1046 (Fed. Cir. 2002)	2
<i>Kara Tech. Inc. v. Stamps.com Inc.</i> , 582 F.3d 1341 (Fed. Cir. 2009)	4
<i>KCJ Corp. v. Kinetic Concepts, Inc.</i> , 223 F.3d 1351, (Fed. Cir. 2000)	7
<i>KSR Int’l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	13
<i>Phillips v. AWH Corp.</i> , 415 F.3d 13034 (Fed. Cir. 2005)	3
<i>Renishaw PLC v. Marposs S.p.A.</i> , 158 F.3d 1243 (Fed. Cir. 1998)	2
<i>Salazar v. Procter & Gamble Co.</i> , 414 F.3d 1342 (Fed. Cir. 2005)	12

<i>SUMMIT 6, LLC v. Samsung Elecs. Co., Ltd.</i> , 802 F. 3d 1283 (Fed. Cir. 2015)	6
<i>Vaupel Textilmaschinen KG v. Meccanica Euro Italia S.p.A.</i> , 944 F.2d 870 (Fed. Cir. 1991)	8, 9, 10
<i>Vitronics Corp. v. Conceptronic, Inc.</i> , 90 F.3d 1576 (Fed. Cir. 1996)	12

STATUTES

35 U.S.C. § 312(a)(3).....	14
----------------------------	----

OTHER AUTHORITIES

Director Review Process, United States Patent and Trademark Office, https://www.uspto.gov/patents/ptab/decisions/director-review-process	1
--	---

REGULATIONS

37 C.F.R. § 42.104(b)(4).....	14
37 C.F.R. § 42.75(a).....	1
37 C.F.R. § 42.75(c).....	1

GLOSSARY

Abbreviation	Term
'698 Patent	U.S. Patent No. 10,934,698
Board	USPTO Patent Trial and Appeal Board
Challenged Claims	Claims 1-14 of the '698 Patent
Dissent	Judge Silverman's Opinion (Dissenting in Part) in the Final Written Decision
Patent Owner	Patent Owner Danco, Inc.
Petitioner	Petitioner Fluidmaster, Inc.
Final Written Decision or FWD	IPR2024-00635 Paper 45 (Final Written Decision)
Institution Decision	IPR2024-00635 Paper 20
Parties	Petitioner and Patent Owner, Collectively
Petition or Pet.	IPR2024-00635 Paper 1
POPR	IPR2024-00635 Paper 13 (Patent Owner Preliminary Response)
POR	IPR2024-00635 Paper 26 (Patent Owner's Response)
Reply	IPR2024-00635 Paper 30 (Petitioner's Reply)
POSR	IPR2024-00635 Paper 36 (Patent Owner's Sur-Reply)
Request	Patent Owner's Request for Director Review
USPTO	United States Patent and Trademark Office

I. INTRODUCTION

The majority opinion incorrectly construed the term “overflow tube” as recited by Claims 8 and 12 as non-limiting. FWD, 17. Relying on its erroneous construction, the majority opinion incorrectly found that “Petitioner has sufficiently established that the cited references teach or suggest Limitations 8B and 12B.” FWD, 24-25. As explained in additional detail in the thorough and well-reasoned dissenting opinion, this conclusion is incorrect. Dissent, 7-22. When a proper, limiting construction of “overflow tube” is applied, there is no question that the cited prior art does not disclose an overflow tube. As such, the majority improperly found Claims 8, 9, 12, and 13 unpatentable. Reversal is appropriate.

II. LEGAL STANDARD

“[T]he Director may review any . . . final written decision. . . .” 37 C.F.R. § 42.75(a). “A party . . . may file one request for Director Review of a decision as provided in [37 C.F.R. § 42.75(a)], instead of filing a request for rehearing of that decision pursuant to § 42.71(d)” before the Board. 37 C.F.R. § 42.75(c). Requests for Director Review are warranted in cases presenting erroneous conclusions of law. See Director Review Process, §2.B, USPTO, <https://www.uspto.gov/patents/ptab/decisions/director-review-process> (last accessed, April 10, 2026).

“Claim construction ‘begins and ends in all cases with the actual words of the

claim.” *Becton, Dickinson & Co. v. Tyco Healthcare Grp., LP*, 616 F.3d 1249, 1254 (Fed. Cir. 2010) (quoting *Renishaw PLC v. Marposs S.p.A.*, 158 F.3d 1243, 1248 (Fed. Cir. 1998)). “The purpose of a patent claim is to define the precise scope of a claimed invention, thereby ‘giving notice both to the examiner at the U.S. Patent and Trademark Office during prosecution, and to the public at large, including potential competitors, after the patent has issued.” *Bicon, Inc. v. Straumann Co.*, 441 F.3d 945, 950 (Fed. Cir. 2006) (quoting *Johnson & Johnston Assocs. Inc. v. R.E. Serv. Co., Inc.*, 285 F.3d 1046, 1052 (Fed. Cir. 2002) (en banc)).

In view of this goal, “claims are interpreted with an eye toward giving effect to all terms in the claim,” because “[a]llowing a patentee to argue that physical structures and characteristics specifically described in a claim are merely superfluous would render the scope of the patent ambiguous, leaving examiners and the public to guess about which claim language the drafter deems necessary to his claimed invention and which language is merely superfluous, nonlimiting elaboration.” *Id.*; see also *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229, 1237 (Fed. Cir. 2016) (“Ideally, claim constructions give meaning to all of a claim’s terms.”).

III. ARGUMENT

The majority opinion in the Final Written Decision improperly construed “overflow tube” as non-limiting. As explained the dissenting opinion (and set forth in additional detail, below), when a correct, limiting construction of “overflow tube”

is applied, there is no dispute that the prior art *does not disclose* the claimed overflow tube.

A. The Board’s conclusion that “overflow tube” is non-limiting is erroneous.

The majority opinion’s decision to adopt Petitioner’s construction of the “overflow tube” of Claims 8 and 12, whereby Petitioner argued this claim language is non-limiting, is at odds with the principle that it is preferable to ascribe meaning to each word in a claim. In addition, Petitioner’s construction is contrary to the intrinsic evidence provided by the other claims of the ’698 Patent.

1. Claim differentiation supports a conclusion that “overflow tube” is limiting.

The claim construction doctrine of claim differentiation teaches (among other things) that “[d]ifferences among claims can . . . be a useful guide in understanding the meaning of particular claim terms.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1314 (Fed. Cir. 2005) (en banc). The ’698 Patent includes four independent claims. Of particular relevance, Independent Claims 8 and 12 (the subject of the instant Request), recite an “overflow tube.”¹ Meanwhile, Independent Claims 1 and 10 (as

¹ Because Limitations 8[B] and 12[B] are identical, Patent Owner refers to Limitation 8[B] as exemplary in certain instances, but such determinations apply equally to Limitation 12[B].

well as their corresponding dependent claims), do not.

For example, comparing the relevant portions of Claims 1 and 8 of the '698 Patent, the presence of the “overflow tube” in Claim 8 is a manifest distinction (emphasis added):

- **Limitation 1[C]:** “a tube configured to attach directly to the bowl fill valve outlet port of the bowl fill valve.”
- **Limitation 8[B]:** “a bowl fill valve outlet port configured to attach directly to a tube that provides water from the bowl fill valve outlet port to an *overflow tube*.”

This distinction suggests that the inclusion of the “overflow tube” in Limitation 8[B]—and the omission of such a recitation in Limitation 1[C]—is meaningful and should have a limiting effect in Claim 8. As Patent Owner previously argued, this distinction reflects a claim drafting choice of whether or not a claim requires an “overflow tube.” *See* POSR, 2-3 (comparing Limitations 8[B] and 12[B] with Limitation 1[C]); *see also Kara Tech. Inc. v. Stamps.com Inc.*, 582 F.3d 1341, 1347 (Fed. Cir. 2009) (“[W]hen the inventor wanted to restrict the claims to require the use of a key, he did so explicitly. None of the claims at issue on appeal recite the term ‘key.’ By contrast, all of the other independent claims require either an ‘encryption key’ or ‘key data.’”).

In contrast, Petitioner’s (and the majority opinion’s) construction of

Limitations 8[B] and 12[B] amounts to ignoring the phrase “to an overflow tube” in favor of focusing solely on the word “configured” in Limitations 8[B] and 12[B]. *See Reply*, 3; *FWD*, 17.

Yet, the word “configured,” appearing in Limitations 8[B] and 12[B], does not dictate the meaning of the subsequently recited “overflow tube.” Limitations 8[B] and 12[B] recite that the “bowl fill valve outlet port” is “configured to attach directly to” the intervening “tube.” However, the “configur[ation]” of the “bowl fill valve outlet port”—or the manner in which it “attach[es]” to the intervening “tube”—does not reflect on the interpretation of either the intervening “tube” or the “overflow tube.”

Insofar as the majority’s construction relies upon the phrase “overflow tube” being introduced in a paragraphs that begins by reciting “a bowl fill valve outlet port,” Petitioner does not explain why a distinct structure (*e.g.*, the “overflow tube”) recited later in the paragraph would not have limiting effect. Indeed, Limitations 8[B] and 12[B] also introduce the intervening “tube,” in addition to the “overflow tube,” later in the paragraph. Yet, the parties do not dispute that the recitations of the “tube,” in each of Limitations 8[B] and 12[B], *do* limit the scope of these claims. *See Pet.*, 44, 45; *POR*, 10. The opinion of the panel majority endorses this construction. To be consistent with the construction of the “tube” claim term, the “overflow tube” term should also be limiting.

2. The preambles of Claims 8 and 12 do not dictate the conclusion that “overflow tube” is non-limiting.

Petitioner also incorrectly argues the preambles of Claims 8 and 12 require the “overflow tube” of Limitations 8[B] and 12[B] to be construed as non-limiting. *See Reply, 2.* Petitioner contends that, because each preamble recites “[a] bowl fill valve comprising,” the claims must be limited in scope to features of the “bowl fill valve” component only—excluding the “overflow tube” recited in the body of each claim. *See id.*; *see also* FWD, 16 (incorrectly holding that “claims 8 and 12, on their face, require “bowl fill valve outlet port, but do not require or recite an “overflow tube” as an element of the claimed “bowl fill valve.”).

While claim preambles are frequently used to express an overall purpose or an intended use for claimed subject matter, such preambles typically do not limit claim scope. *SUMMIT 6, LLC v. Samsung Elecs. Co., Ltd.*, 802 F. 3d 1283, 1292 (Fed. Cir. 2015) (“Generally, a preamble is not limiting. For example, preamble language that merely states the purpose or intended use of an invention is generally not treated as limiting the scope of the claim.”) (cleaned up).

Here, Petitioner argues that the preambles of Claims 8 and 12 curtail the scope of each claim, so as to ascribe no limiting effect to the “overflow tube” language of Limitations 8[B] and 12[B]—terms recited in the *bodies* of these claims. *See Reply, 2–3.* However, whether the preamble is, or is not limiting does not affect the meaning of the “overflow tube” claim language at issue. In the ’698 Patent, the

preambles of Claims 8 and 12 recite “[a] bowl fill valve,” which is then repeated and further described in the body of each claim. *See* EX1001, 10:65, 11:5, 12:9, 12:15. There is no dispute, in this proceeding, that Claims 8 and 12 require a “bowl fill valve.” After the term “bowl fill valve,” the preambles of Claims 8 and 12 go on to recite the transition word, “comprising” (*id.* at 10:65, 12:9), which has a well-established meaning in patent law. *Crystal Semiconductor Corp. v. TriTech Microelectronics. Int’l, Inc.*, 246 F.3d 1336, 1348 (Fed. Cir. 2001) (citing *KCJ Corp. v. Kinetic Concepts, Inc.*, 223 F.3d 1351, 1356, (Fed. Cir. 2000)) (“When a patent claim uses the word “comprising” as its transitional phrase, the use of ‘comprising’ creates a presumption that the body of the claim is open. In the parlance of patent law, the transition ‘comprising’ creates a presumption that the recited elements are only a part of the device, that the claim does not exclude additional, unrecited elements.”).

In view of the “open” transition word “comprising”—and contrary to Petitioner’s argument—the preambles of Claims 8 and 12 should not be understood to deprive the term “overflow tube” (recited in the body of each claim) of its limiting effect. Thus, even though the preamble of each claim recites “[a] bowl fill valve,” the claim scope may include limitations beyond the particular elements of the “bowl fill valve” component disclosed in the ’698 Patent’s specification.

Once again, the majority opinion’s construction of Claims 8 and 12 as being

limited to features of the “bowl fill valve” conflicts with the parties’ undisputed constructions of the intervening “tube” of Limitations 8[B] and 12[B]. Under Petitioner’s proposed approach, the recitation of this “tube” should have not limiting effect, because it is not part of the “bowl fill valve” recited in the preamble of each claim. Yet, the parties indisputably agree to the contrary—the intervening “tube” introduced in Limitations 8[B] and 12[B] has limiting effect. *See* Pet., 44, 45; POR, 10.

3. The claimed “overflow tube” does not merely provide a “reference point.”

Petitioner’s characterization (Reply, 3) of the “overflow tube” as something that merely provides “a ‘reference point’ to define the ‘purpose and structure’ of the bowl fill valve outlet port” is also misplaced.

The Federal Circuit articulated the notion of a non-limiting claim feature, which merely establishes a “reference point” for other recited elements, in *Vaupel Textilmaschinen KG v. Meccanica Euro Italia S.p.A.*, 944 F.2d 870, 879–80 (Fed. Cir. 1991), and applied it again in *C.R. Bard, Inc. v. M3 Sys., Inc.*, 157 F.3d 1340, 1350 (Fed. Cir. 1998) (citing *Vaupel*), as well as *Eko Brands, LLC v. Adrian Rivera Maynez Enters., Inc.*, 946 F.3d 1367, 1377 (Fed. Cir. 2020) (citing *C.R. Bard*). All three of these cases involved claim terms introduced in the preambles of the respective claims and, in each case, the Federal Circuit determined that the claim language at issue did not limit the scope of the claims. *See e.g.*, Dissent, 16-19.

In one aspect, *Vaupel*, *C.R. Bard*, and *Eko Brands* all involve non-limiting claim language that described interactions with and relative movements of other recited structures. *See Vaupel*, 944 F.2d at 880 (explaining that the “breast beam” and “breast plate” “indicate a reference point to fix the direction of movement of the woven fabric from the loom.”); *C.R. Bard*, 157 F.3d at 1349 (referring to the “biopsy needle” “coupling . . . to said first slide for longitudinal motion both toward and away from said forward end of said housing.”); *Eko Brands*, 946 F.3d at 1376 n.3 (describing the filter cartridge being “removably receivable within” and “configured to receive an outlet probe” and an “inlet probe” of the single-serve beverage brewing machine). In this sense, the non-limiting claim features are used to describe structural features of other elements recited in the claims.

By contrast, the connection and interaction between the intervening “tube” and the “overflow tube” features in Limitations 8[B] and 12[B] are unspecified; stating only that the “tube . . . provides water from the bowl fill valve outlet port to an overflow tube.” Thus, the “overflow tube” recitations in Limitations 8[B] and 12[B]—unlike the recited features of the single-serve brewer in *Eko Brands*, 946 F.3d at 1377—do not “define the purpose and structure of” other features in the respective claims.

Moreover, unlike the claims in *Vaupel*, *C.R. Bard*, and *Eko Brands*, the “overflow tube” is not needed to understand the other features recited in the claims

of the '698 Patent; indeed, Independent Claims 1 and 10 of the '698 Patent do not recite an “overflow tube” at all.

Still further, and perhaps most fundamentally, the non-limiting claim terms of *Vaupel*, *C.R. Bard*, and *Eko Brands* referred to framework structures (a loom, a biopsy gun, and a beverage brewing machine, respectively) that physically supported distinct removable, reusable, and replaceable elements—textile weaving/cutting elements, a biopsy needle, and a beverage cartridge, respectively. Notably, the claims in *C.R. Bard* and *Eko Brands* distinguish the framework structures from the removable elements with the expression “for use with,” thereby signaling their separateness. *See C.R. Bard*, 157 F.3d at 1348 (reciting “[a] biopsy needle for use with a tissue sampling device”); *Eko Brands*, 946 F.3d at 1376 (reciting “[a] beverage brewing device for use with a single serve beverage brewer having a brewing holster, an inlet probe . . . , and an outlet probe”) (emphasis omitted). As the Federal Circuit remarked, in *Eko Brands*, 946 F.3d at 1377, the claim “on its face does not require a beverage brewer.” Such separateness is also reflected, for example, in the Federal Circuit’s observation, in *Vaupel*, 944 F.2d at 880, that the “breast beam” and “breast plate” “are not illustrated in any of the figures of the . . . patent or otherwise described in the specification.”

The '698 patent does not exhibit any such separateness for the “overflow tube,” as seen, for example, in Figure 3 (below) and the accompanying description

in the specification, wherein the “overflow tube” (element 149) is identified in the same manner as the other components of the disclosed embodiments. *See* Ex. 1001, 3:57–4:21.

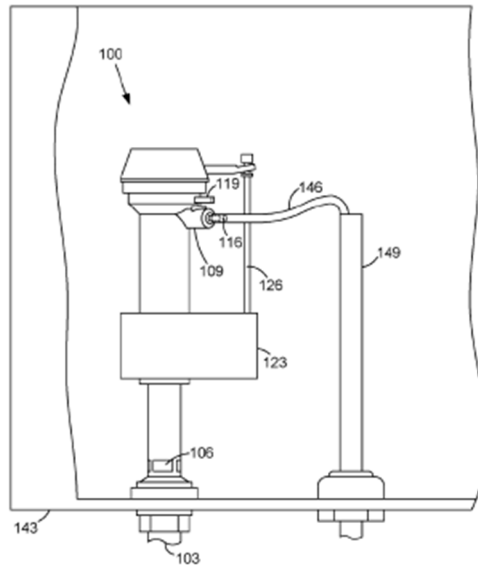


FIG. 3

Finally, *Eko Brands* also remarked that “there is nothing in the prosecution history suggesting that the beverage brewer itself is part of the claim.” 946 F.3d at 1377. It is worth noting that, by contrast, during prosecution of the application that issued as the ’698 Patent, the Examiner mapped the “overflow tube” to the prior art DeMarco reference (EX1024)—a determination that the applicant did not dispute. *See* EX1002, 65–66, 100–101. While the applicant’s silence, in this context, does *not* establish a disavowal or disclaimer of claim scope, the Federal Circuit has stated that such unchallenged determinations by the Examiner may shed some light on the meaning of claim language. *See Salazar v. Procter & Gamble Co.*, 414 F.3d 1342,

1345-47 (Fed. Cir. 2005). Although unilateral statements by an examiner do not give rise to a clear disavowal of claim scope by an applicant, it does not necessarily follow that such statements are not pertinent to construing claim terms. Statements about a claim term made by an examiner during prosecution of an application may be evidence of how one of skill in the art understood the term at the time the application was filed.”).

Such a view is consistent with the notion that the prosecution history is part of the public record of a patent, upon which the public may rely, in order to understand the scope of the patent rights. *See Vitronics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1583 (Fed. Cir. 1996). Thus, although it is by no means dispositive, the Examiner’s mapping of the “overflow tube” (recited in claims that would issue as claims 8 and 12) to a prior art reference, further indicates that these recitations should be regarded as limitations on the scope of the claims.

4. The claimed “overflow tube” is limiting even if it is generic.

Petitioner also contends that the “overflow tube” recitations of Claims 8 and 12 have no limiting effect, because they are allegedly “generic.” *See Reply*, 2–3. Yet, Petitioner does not explain why the purported generic quality of the “overflow tube” would render this language non-limiting. Moreover, reciting old or generic features in a patent claim is not only permissible, it is often unavoidable. Indeed, “inventions in most, if not all, instances rely upon building blocks long since

uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known.” *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 418–19 (2007).

In view of the foregoing, the “overflow tube” of Limitations 8[B] and 12[B] should be construed as having limiting effect on the scope of the claims.

B. The prior art does not disclose the “overflow tube” limitations.

Neither Guoxin nor Ho disclose the claimed “overflow tube.”

First, Ho fails to teach these limitations, instead disclosing “an example of a tube (supply line 40) which provides water from a valve to the bowl *without* first passing through an overflow tube, yet nevertheless discloses a stand-alone overflow tube.” POSR, 5 (citing EX1022, Figs. 1–2; EX2015, 145:14–20, 156:14–157:9).

Second, Guoxin does not explicitly disclose an overflow tube, but instead discloses that its switching mechanism 4 has water outlet 402 connected to water supply line 403 (EX1016, 5)—these are the elements that Petitioner maps, respectively, to the recited “bowl fill valve,” “bowl fill valve outlet port,” and “tube” of Claims 8 and 12. *See* Pet., 33, 35–36, 45–46 (citing EX1004 ¶¶ 116, 121, 124, 147, 149; EX1016, 2, Figs. 2–5). Rather than disclosing a “tube that provides water from the bowl fill valve outlet port to an overflow tube,” as required by Limitations 8[B] and 12[B], Guoxin states that water supply line 403 “is directed to the toilet to *directly* provide water supply to the toilet.” EX1016, 5 (emphasis added).

Third, Petitioner’s argument that Guoxin “does not preclude an intermediating connection via an overflow tube” (Reply, 7) also does not establish that Guoxin teaches an “overflow tube.”

Finally, Petitioner’s repeated assertion, to the effect that overflow tubes are “conventional” structures, is unpersuasive. Regardless of whether a particular claim limitation might constitute conventional technology, a Petitioner in an IPR proceeding “must specify where each element of the claim is found in the prior art patents or printed publications relied upon.” 37 C.F.R. § 42.104(b)(4); *see also* 35 U.S.C. § 312(a)(3) (requiring *inter partes* review petitions to identify “with particularity . . . the grounds on which the challenge to each claim is based”).

IV. CONCLUSION

For the reasons set forth herein, Patent Owner respectfully requests reversal of the majority’s holding that Claims 8, 9, 12, and 13 of the ’698 Patent are unpatentable.

Dated: April 10, 2026

Respectfully submitted,

/Thomas F. Finch /

Jason M. Perilla (Reg. No. 65,731)
Kenneth A. Knox (Reg. No. 71,306)
Eric G. Maurer (*admitted pro hac vice*)
Thomas F. Finch (Reg. No. 82,341)

PERILLA KNOX & HILDEBRANDT LLP

5871 Glenridge Drive
Suite 350
Atlanta, GA 30328-5376
Telephone: (770) 927-7802
Facsimile: (877) 389-6779

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the April 10, 2026, a complete and entire copy of the foregoing **PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW**, was served by consent of counsel of record for Petitioners electronically, via e-mail, as follows:

Lead Counsel

Carolyn S. Toto
(Reg. No. 56,817)
PILLSBURY WINTHROP SHAW
PITTMAN LLP
725 South Figueroa Street, 36th Floor
Los Angeles, CA 90017-5406
Telephone: (213) 488-7238
Facsimile: (213) 629-1033
carolyn.toto@pillsburylaw.com
docket_ip@pillsburylaw.com

Back-up Counsel

Evan Finkel
(Reg. No. 49,059)
PILLSBURY WINTHROP SHAW
PITTMAN LLP
725 South Figueroa Street, 36th Floor
Los Angeles, CA 90017-5406
Telephone: (213) 488-7307
Facsimile: (213) 226-4058
evan.finkel@pillsburylaw.com

Ranjini Acharya
(*Pro Hac Vice*)
Texas State Bar No.:24045696
PILLSBURY WINTHROP SHAW
PITTMAN LLP
2550 Hanover Street
Palo Alto, CA 94304-1115
Telephone: (650) 233-4085
Facsimile: (650) 233-4545
ranjini.acharya@pillsburylaw.com

Dated: April 10, 2026

Respectfully submitted,

/Thomas F. Finch /
Thomas F. Finch (Reg. No. 82,341)