Paper No. 47
Filed: April 16, 2026

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

AUTHORIZED RESPONSE TO DIRECTOR REVIEW REQUEST

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EX1001	U.S. Patent No. 10,934,698 to Schuster et al.
EX1002	Prosecution History of U.S. Patent No. 10,934,698 to Schuster et al. (Application No. 16/686,328, filed Nov. 8, 2019)
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EX1004	Expert Declaration of Dr. Kimberly Cameron, Regarding Invalidity of the Challenged Claims of U.S. Patent No. 9,139,993 to Schuster et al.
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EX1011	Prosecution History of U.S. Patent No. 7,743,436 to Schuster et al. (Application No. 10/958,797, filed October 5, 2004)
EX1012	Prosecution History of U.S. Patent No. 6,823,889 to Schuster (Application No. 10/798,606, filed on Mar. 11, 2004)
EX1013	Amended Complaint (Dkt. 35) in *Danco, Inc. v. Fluidmaster, Inc., et al.*, Case No. 8:23-cv-01156 (C.D. Cal.), filed October 2, 2023
EX1014	U.S. Patent No. 6,546,568 B1 to Schuster issued April 15, 2003 from Application No. 09/969,320 filed October 1, 2001, as a continuation of Application No. 09/634,249 filed August 8, 2000 (now U.S. Patent No. 6,295,660)

Exh. No.	Description of Exhibit
EX1015	Registered Utility Model Publication Number CN2447417Y to Guoxin published September 12, 2001
EX1016	Certified Translation (together with a statement that the translation is true and accurate) of Registered Utility Model Publication Number CN2447417Y to Guoxin published September 12, 2001
EX1017	U.S. Patent No. 5,926,868 to Bjerke issued July 27, 1999
EX1018	U.S. Patent No. 5,249,830 to Calmettes, et al. issued October 5, 1993
EX1019	U.S. Patent No. 989,251 to Hall issued April 11, 1911
EX1020	Canadian Patent No. 1,320,235 to Kimber granted and published July 13, 1993
EX1021	U.S. Patent No. 3,086,546 to Brown issued April 23, 1963
EX1022	U.S. Patent No. 5,862,538 to Ho issued June 26, 1999
EX1023	U.S. Patent No. 4,980,932 to Stemples issued January 1, 1991
EX1024	U.S. Patent No. 5,708,991 to DeMarco issued January 20, 1998
EX1025	U.S. Patent No. 5,715,860 to Horad issued February 10, 1998
EX1026	U.S. Patent No. 5,134,729 to Shaw issued August 4, 1992
EX1027	U.S. Patent No. 5,855,025 to Williams issued January 5, 1999
EX1028	U.S. Patent No. 6,219,856 to Alles issued April 24, 2001
EX1029	U.S. Patent No. 8,104,105 to Schuster et al. issued January 31, 2012
EX1030	Order Re: Civil Jury/Court Trial I. Schedule II. Trial Preparation III. Conduct Of Attorneys And Parties (Dkt. 45) in *Danco, Inc. v. Fluidmaster, Inc., et al.*, Case No. 8:23-cv-01156 (C.D. Cal.), entered February 7, 2024
EX1031	Infringement Contentions in *Danco, Inc. v. Fluidmaster, Inc., et al.*, Case No. 8:23-cv-01156 (C.D. Cal.), served February 24, 2024
EX1032	Order Granting Stipulation Regarding Patent Schedule (Dkt. 47) in *Danco, Inc. v. Fluidmaster, Inc., et al.*, Case No. 8:23-cv-01156 (C.D. Cal.), entered February 28, 2024

Exh. No.	Description of Exhibit
EX1033	Declaration of Ranjini Acharya in Support of Petitioner's Motion for Admission *Pro Hac Vice* of Ranjini Acharya
EX1034	Order Granting Defendant's Motion to Stay Case Pending IPR (Dkt. 48) in *Danco, Inc. v. Fluidmaster, Inc., et al.*, Case No. 8:23-cv-01156 (C.D. Cal.), entered April 3, 2024
EX1035	Comparison of Annotated Figures in Petition (Paper 1) and Expert Declaration (EX1004)
EX1036	Supplemental Expert Declaration of Dr. Kimberly K. Cameron, Ph.D., dated March 19, 2025
EX1037	Transcript of Deposition of Michael Jobin, taken March 11, 2025
EX1038	Demonstrative of Figure 7 of EX1022 (Ho), marked during deposition of Michael Jobin, taken March 11, 2025

GLOSSARY

Abbreviation	Term
’105 Patent	U.S. Patent No. 9,103,105
’606 Application	U.S. Patent App. No. 10/798,606
’698 Patent	U.S. Patent No. 10,934,698
’904 Application	U.S. Patent App. No. 12/786,904
’993 Patent	U.S. Patent No. 9,139,993
Board	USPTO Patent Trial and Appeal Board
Challenged Claims	Claims 1-14 of the ’698 Patent
Danco, Patent Owner, or PO	Danco, Inc.
Fluidmaster or Petitioner	Fluidmaster, Inc.
FWD	Final Written Decision, IPR2024-00635 Paper 45
Parties	Danco and Fluidmaster, collectively
Petition	IPR2024-00635 Paper 1
POR	IPR 2024-00635 Paper 26 (Patent Owner Response)
POSITA	Person of Ordinary Skill in the Art
Reply	IPR 2024-00635 Paper 30 (Petitioner’s Reply)
Request	IPR2024-00635 Paper 46 (Patent Owner’s Request for Director Review)
Surreply	IPR 2024-00635 Paper 36 (Patent Owner’s Surreply)
USPTO	United States Patent and Trademark Office

I. INTRODUCTION

Petitioner respectfully submits this response to Patent Owner's Request for Director Review ("Request"), pursuant to prior authorization given by the Board on April 10, 2026.[1] The Request seeks reversal of a portion of the Board's FWD, based on a disagreement with the Board's construction of the "overflow tube" language in claims 8 and 12 (and dependent claims 9 and 13) of the '698 Patent. *See* Request at 1–3. The Request does not identify any material error of fact or law, nor an abuse of discretion or important policy issues. Instead, it reprises the Board's dissenting opinion and asks the Director to adopt that alternative interpretation.

The Board considered that position, concluding that the phrase "overflow tube" appears as part of a clause describing the function and configuration of the claimed device, not as a separately recited structural element. *See* FWD, Majority at 15-18, n. 8. Under that construction, the Board further determined that the prior art teaches or suggests the challenged limitations. *Id*. at 24–25.

Because the Request identifies no legal error and instead urges simply adopting a different interpretation of the same record, Director Review is not warranted. The Request should be denied.

[1] By filing this authorized response, Petitioner reserves, and does not waive, its rights to raise any and all issues and challenges otherwise available to it in any appeal or other review of any of the grounds addressed by the FWD.

II. LEGAL STANDARDS

Requests for Director Review are limited to decisions that present "(a) an abuse of discretion, (b) important issues of law or policy, (c) erroneous findings of material fact, or (d) erroneous conclusions of law." Director Review Process § 2(B) (https://www.uspto.gov/patents/ptab/decisions/director-review-process) (accessed April 14, 2026).

III. ARGUMENT

A. The Board Correctly Construed Claims 8 and 12

1. Claim Differentiation Does Not Transform the "Overflow Tube" Into a Separate Structural Limitation.

PO first argues that claim differentiation requires treating "overflow tube" as limiting because it appears in claims 8 and 12 but not in claims 1 and 10. *See* Request at 3-5; *see also See* FWD, Dissent at 8.

But this overlooks that claims 1 and 10 are directed to different subject matter from claims 8 and 12. Claims 1 and 10 are respectively directed to the components of a toilet system and a method for configuring a toilet system. By contrast, claims 8 and 12 are directed to a component of a toilet system: a "bowl fill valve." *See* FWD, Majority at 15-18 ("Claims 8 and 12 are directed to a 'bowl fill valve"). The difference in language reflects that difference in scope.

More fundamentally, PO's argument assumes that the presence of additional words necessarily introduces a separate structural limitation. That is not the law:

"The doctrine of claim differentiation creates only a presumption that each claim in a patent has a different scope that cannot broaden claims beyond their correct scope." *Fantasy Sports Props., Inc. v. Sportsline.com, Inc.,* 287 F.3d 1108, 1115 (Fed. Cir. 2002) (quotation marks and citations omitted). Thus, claim differentiation is "a guide, not a rigid rule," and cannot override the language of the claim itself. *Curtiss-Wright Flow Control Corp. v. Velan, Inc.,* 438 F.3d 1374, 1380 (Fed. Cir. 2006).

Here, the Board correctly analyzed the clause ***as written***. The plain language of the clause recites a structure ("a bowl fill valve outlet port,") and its configuration ("configured to attach directly to a tube") and then describes the function of that intervening tube (*i.e.* the tube "provides water from the bowl fill valve outlet port to an overflow tube."). The intervening "tube" is the object of the attachment to the structural elements of the claimed bowl fill valve; the "overflow tube" is identified only as the downstream destination of water flowing from the valve via the tube. Thus, the Board correctly concluded, the phrase "to an overflow tube" appears in claims 8 and 12 as part of the functional description of the intervening tube and the configuration of the claimed outlet port. FWD, Majority at 17.

It does not follow that the absence of this language from claims 1 and 10 signifies a separately recited structure in claims 8 and 12. *See, e.g., PPC Broadband, Inc. v. Charles Indus., LLC*, No. CV 22-1517-GBW-SRF, 2024 WL 79876, at *3 (D. Del. Jan. 8, 2024) (holding that the term "drop cable," appearing in the body of the

claim, did not introduce a separate structural requirement; rejecting the argument that the presence of that phrase required treating it as a separate element); *see also DSC Commc'ns Corp. v. Pulse Commc'ns, Inc.*, 170 F.3d 1354, 1368 (Fed. Cir. 1999) (explaining that the recitation of a "telephone instrument" was not a structural limitation but that it "simply requires the apparatus to provide POTS-type service that uses DC signaling to a telephone instrument.").

Moreover, the assumption that because the intervening "tube" is limiting, the "overflow tube" must also be limiting "to be consistent" (*see* FWD, Dissent at 10), likewise does not follow from the claim language. In claims 8 and 12, the intervening tube is specifically recited as the structure to which the outlet port attaches, but the overflow tube is recited only as the destination of water conveyed through the claimed tube ("that provides water from the bowl fill valve outlet port to an overflow tube."). Thus, the "overflow tube" is not a separately recited structural limitation.

The difference in language between these two sets of claims simply reflects a difference in the subject matter being claimed; and the plain language of claims 8 and 12 confirms they recite a component in relation to the environment in which it operates, without transforming every referenced feature of that environment into a structural limitation of the claimed device.

2. The Preambles of Claims 8 and 12 Do Not Alter the Meaning or Scope of "Overflow Tube"

Next, PO argues that the preambles of claims 8 and 12 "do not dictate the conclusion that 'overflow tube' is non-limiting." Request at 6-8. In particular, PO contends that Petitioner improperly relied on the preamble language of claims 8 and 12 ("[a] bowl fill valve, comprising") to exclude the overflow tube from the scope of the claims, and that the open-ended nature of the term "comprising" confirms that the overflow tube may still be a limiting element. *Id*. The dissent advances a similar view. FWD, Dissent at 15 ("the preambles of claims 8 and 12 should not be understood to deprive the 'overflow tube' terms, recited in the body of each claim, of limiting effect."). Neither addresses the reasoning actually adopted by the Board.

Petitioner explained that the phrase "overflow tube" appears only as part of the functional description of how the bowl fill outlet port and attached tube operate together. *See* Reply at 2–3 ("overflow tube" "is recited solely to define the function of the outlet port on the bowl fill valve."). Petitioner did not argue that the preamble narrows the claim to exclude the overflow tube, but that the claim language itself does not recite the overflow tube as a component of the claimed device. *Id.* The Board likewise focused on the structure in the body of the claim and concluded that the "overflow tube" is part of the description of the function of the intervening tube and the configuration of the outlet port, and not separately claimed. *See* FWD,

Majority at 17. The Board's analysis thus also turned on the language of the body of the claim itself, not on the scope of the preamble.

The reliance on the open-ended "comprising" transition does not change that analysis. Request at 17; FWD, Dissent at 14-15. PO correctly notes, "comprising" creates an open-ended claim – but this simply means that "the claim does not exclude additional, unrecited elements." *Crystal Semiconductor Corp. v. TriTech Microelectronics Int'l, Inc.*, 246 F.3d 1336, 1348 (Fed. Cir. 2001). That is, the claim may be met by an accused device or a prior art reference that meets all the claim elements but also includes additional, unrecited elements. *Gillette Co. v. Energizer Holdings, Inc*., 405 F.3d 1367, 1372-73 (Fed. Cir. 2005). It does ***not*** establish that every structure referenced in the body of the claim must be treated as a required element of the claimed device; indeed, the Federal Circuit has repeatedly recognized that claim language may refer to external structures to define the configuration or operation of a claimed device without transforming those structures into claim limitations. *See Eko Brands, LLC v. Adrian Rivera Maynez Enters., Inc.*, 946 F.3d 1367, 1377 (Fed. Cir. 2020) (referenced structure "not required" but serves as a "reference point"); *C.R. Bard, Inc. v. M3 Sys., Inc.*, 157 F.3d 1340, 1350 (Fed. Cir. 1998) (structure "provides reference points" but is not part of the claimed invention); *Vaupel Textilmaschinen KG v. Meccanica Euro Italia S.p.A.*, 944 F.2d 870, 880 (Fed. Cir. 1991) (same). The question remains whether the claim recites the overflow

tube as part of the device. The Board correctly concluded that it does not, based on the plain language of the limitation as written.

In short, Patent Owner's preamble argument addresses a position that the Board did not adopt. It does not demonstrate any error in the Board's construction.

3. The "Overflow Tube" is a Reference Point for the Configuration of the Bowl Fill Valve Outlet Port

Patent Owner's principal argument is that the "overflow tube" cannot be treated as a "reference point," and attempts to distinguish *Vaupel*, *C.R. Bard*, and *Eko Brands* on that basis. Request at 8-12. PO specifically emphasizes that the referenced structures in *Vaupel*, *C.R. Bard*, and *Eko Brands* were introduced in the preamble, were separate from the claimed invention, or were necessary to understand the recited structure. *Id.* PO's approach mirrors the dissent, which argues that those cases are limited to circumstances involving preamble language, "framework structures," or particular forms of interaction between recited elements. FWD, Dissent at 16-22. These arguments do not establish error.

Nothing in the Federal Circuit's analysis limits those decisions to preamble language or "framework structures." Claim language may refer to external structures ("reference points") that define how a claimed device is configured or operates, without transforming those structures into recited limitations. Moreover, *PPC Broadband* confirms this point. There, the court specifically rejected the

argument that *Eko Brands* and *C.R. Bard* are limited to preamble language and held that the relevant inquiry is how the disputed term functions within the claim. *PPC Broadband, Inc. v. Charles Indus., LLC*, No. CV 22-1517-GBW-SRF, 2024 WL 79876, at *4 (D. Del. Jan. 8, 2024) ("The challenged terms in *Eko Brands, [C.R. Bard]*, and *DSC* appeared throughout the body of the claims as well as in the preamble…The Federal Circuit's discussion of terms that serve as a 'reference point' to define the purpose and structure of claim limitations are therefore relevant to the dispute presently before the court."). The court explained that, therefore, a term appearing in the body of a claim may likewise serve as a contextual reference defining the configuration or operation of the claimed device, rather than being recited as a separate structural limitation. *Id*. ("As long as the [drop interface box ("DIB")] and its associated components are capable of receiving the drop cable, the claim requirements are met and the presence or lack of an actual drop cable in the DIB is irrelevant.").

That reasoning applies here. The phrase "to an overflow tube" appears at the end of the clause describing the function of the intervening tube: "a tube that provides water from the bowl fill valve outlet port to an overflow tube." As the Board explained, this phrase is part of the function defining the relationship between the recited outlet port and the intervening tube. FWD, Majority at 17. It identifies the

downstream destination of the water conveyed through that tube and thus helps define the configuration and function of the claimed bowl fill valve outlet port.

PO argues that, unlike the claims in *Eko Brands*, the "overflow tube" here does not define the "purpose and structure" of the claimed device. Request at 10-11; *see also* FWD, Dissent at 16-20. But that argument overlooks the claim language: it describes a structural feature (the bowl fill outlet port) and its configuration (configured to attach directly to a tube) and then describes the ***function*** of that intervening tube in terms of the downstream flow to an overflow tube. The Board's construction recognizes that the phrase "overflow tube" thus defines the purpose and structure of the intervening tube and does not introduce a separate structural component.

PO also contends that the "overflow tube" is not needed to understand the other elements of the claim and therefore cannot serve as a reference point. *See* Request at 10-11; FWD, Dissent at 20. That is not the relevant inquiry. The Federal Circuit authorities discussing the use of "reference points" import no requirement that those terms must be ***necessary*** to understand a claim; they simply recognize that such structures may provide context for how the claimed invention operates. Here, the overflow tube provides that context by describing the downstream function of the fluid path associated with the outlet port.

PO also emphasizes that the overflow tube appears in the specification as a physical component of the disclosed system and argues that this weighs in favor of treating it as a structural limitation. *See* Request at 11; FWD, Dissent at 21. But the presence of a structure in an embodiment does not determine whether that structure is recited as a claim element. *Phillips v. AWH Corp.,* 415 F.3d 1303, 1323 (Fed. Cir. 2005) ("[W]e have repeatedly warned against confining the claims to those embodiments [described in the specification].").

Finally, PO's reliance on the prosecution history does not alter this analysis. PO points to an instance in which the Examiner mapped the "overflow tube" to a prior art reference and notes that the applicant did not dispute that mapping. Request at 11–12; *see also* FWD, Dissent at 22. That does not establish claim scope. Statements from an Examiner as to how claim terms correspond to prior art may be "pertinent" to claim construction, but they are not dispositive. *Salazar v. Procter & Gamble Co.*, 414 F.3d 1342, 1347 (Fed. Cir. 2005); *Innova/Pure Water, Inc. v. Safari Water Filtration Sys., Inc.*, 381 F.3d 1111, 1124 (Fed. Cir. 2004) ("It is well settled, however, that it is the applicant, not the examiner, who must give up or disclaim subject matter that would otherwise fall within the scope of the claims."). Nor does an applicant's silence amount to an agreement as to claim scope or a disclaimer. *Id., see also 3M Innovative Props. Co. v. Tredegar Corp.*, 725 F.3d 1315, 1326 (Fed. Cir. 2013) (disavowal must be both clear and unmistakable). In any event, the

Examiner's remarks did not resolve whether the "overflow tube" language was a separate structural limitation.[2] At most, the Examiner's mapping of the prior art simply confirmed that the prior art reference disclosed a bowl fill outlet port configured to direct water to an overflow tube, as recited in the claim – not that the overflow tube is itself a required element of the claim.

Ultimately the Board concluded that the phrase "overflow tube" describes the function and configuration of the bowl fill outlet port and is not limiting – and neither the prosecution history nor the other IPR proceedings undermine that conclusion. There is no error.

4. Whether or Not the "Overflow Tube" Is Generic, It Is Not a Separately Claimed Element

Finally, PO briefly argues that the "overflow tube" must be limiting even if it is "generic." Request at 12–13. *See also* FWD, Dissent at 13 (same). This does not address the issue the Board resolved. The question before the Board was not whether the overflow tube is a known or conventional structure, but whether the claim language recites it as a structural element of the claimed bowl fill valve. Indeed, the premise of PO's argument is largely beside the point. It is true that claims may recite

[2] A reliance on related IPR proceedings would be similarly misplaced. *See* FWD, Dissent at 10-13. Claim construction is claim-specific, and as the Board explained, the claims in those proceedings recited the "overflow tube" in materially different contexts, making those decisions inapposite here. *See* FWD, Majority at 17 n.8.

generic or conventional structures as limitations. But it does not follow that every referenced structure must be a limitation. As discussed above, claim language may refer to structures to define the configuration of a claimed device without converting them into claim limitations. See *Eko Brands*, 946 F.3d at 1377 ("reference point"); *C.R. Bard*, 157 F.3d at 1350 (same); *PPC Broadband*, 2024 WL 79876, at *3 (term defines configuration, not structure).

Patent Owner's reliance on *KSR* similarly does not advance its argument. Request at 12-13 (citing "generic features"). The fact that patent claims may incorporate known or conventional elements does not determine whether a particular phrase in a claim is limiting; the inquiry depends on the language of the claim itself, not on whether the referenced structure is familiar in the art. Here, the phrase "overflow tube" appears within the clause describing the function of the intervening tube and the configuration of the claimed bowl fill valve outlet port. The Board correctly concluded that this language defines the functional context of the claimed connection, not an additional component of the claimed device. FWD, Majority at 17. Thus, the Board correctly concluded that "overflow tube" is not recited as a separate structural limitation in claims 8 and 12 of the '698 Patent.

B. The Board Correctly concluded that Claims 8 and 12 are Unpatentable in light of the Prior Art

PO concludes with a brief argument that neither Guoxin nor Ho identifies an "overflow tube," which is premised on PO's belief that "overflow tube" ought to be construed as a separate structural limitation. *See* Request at 13-14; *see also* FWD, Dissent at 23-28. The Board rejected that argument under the proper construction. FWD, Majority at 15-18.

As Petitioner identified, the relevant structures are disclosed in claims 8 and 12 in Guoxin: switching mechanism 4 maps to the claimed bowl fill valve, outlet 402 to the bowl fill valve outlet port, and water supply line 403 to the claimed tube. *See* Petition at 33, 35–36, 45–46. PO does not dispute this but argues that Guoxin does not disclose an overflow tube or a tube that provides water to an overflow tube. *See* Request at 13. That depends on treating the overflow tube as a structural limitation, which the Board correctly rejected. Petitioner's Reply also addressed this issue directly. Reply at 4-6 (explaining that it is not necessary to identify a separately recited overflow tube in the prior art reference). The Board adopted that reasoning. FWD, Majority at 18, 24-25. PO, by contrast, failed to advance any argument that the limitation nevertheless could not be met under the proper construction – and the Board rightly pointed this out. *See, e.g.,* FWD, Majority at 24-25 (noting that PO had not argued that Guoxin's outlet port 402 is not configured to attach directly to a

tube that provides water from the bowl fill valve outlet port to an overflow tube; and that "the structure of Guoxin's outlet port 402 is quite similar to the structure of the '698 patent's bowl fill valve outlet 116.") (citations omitted).

Petitioner also addressed PO's alternative argument that, even under Petitioner's construction, Guoxin fails to show that line 403 provides water to an overflow tube. Request at 13-14. Petitioner explained that a POSITA would understand that such tubes are conventionally routed to overflow tubes. Reply at 4-7; *citing* EX1036, ¶¶11-23 (explaining that the overflow tube is a conventional component of the toilet system and that a POSITA would understand the intervening tube attached to the claimed bowl fill valve would operate in a conventional manner in directing water from the bowl fill valve to an overflow tube).

Patent Owner's argument focuses on the absence of an explicit depiction of an overflow tube in Guoxin and on the statement that water supply line 403 "is directed to the toilet to directly provide water supply to the toilet." Request at 13; *see also* FWD, Dissent at 23-28. But as the Board recognized, that language does not preclude the conventional routing described in the record. Guoxin does not specify the ultimate termination point of line 403, and its figures depict only a partial configuration. Reply at 6-7. And both experts agreed that a POSITA would understand Guoxin to disclose several intermediating connections, and that such connections would be routine. *Id.* (citing EX1037, 52:1-21; EX1036, ¶¶26-27).

PO also argues that Petitioner's reliance on conventionality is insufficient (Request at 14) and the dissent criticizes it as circular. FWD, Dissent at 27. This fails in two respects. ***First***, PO again assumes that the overflow tube is recited as a separate claim element. It is not, and Petitioner satisfied its burden by identifying the claimed bowl fill valve, outlet port, and attached tube. Petition at 33, 35–36, 45–46. ***Second*****,** Petitioner did more than assert that overflow tubes are conventional; the Petitioner identified specific prior art and expert testimony explaining how tubes of the type disclosed in Guoxin are conventionally used in toilet systems. *See, e.g.,* Reply at 4-6. The Board was entitled to credit that evidence.

Finally, PO's reliance on Ho to argue that the prior art does not disclose the claimed configuration is misplaced. Request at 13. Ho's disclosure of a different path for the flow of water does not undermine the Board's conclusion that Guoxin, in view of the knowledge of a POSITA, satisfies the limitation.

In short, PO's prior art argument depends on the same premise as its claim construction argument: that claims 8 and 12 ***require*** Petitioner to specifically show the presence of an overflow tube in the prior art. The Board rejected that premise and evaluated the prior art under the correct construction. Again, there is no error.

IV. CONCLUSION

The Board correctly construed the claims and properly determined that the prior art renders the challenged claims unpatentable. The Request should be denied.

Dated: April 16, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2026, a true copy of the foregoing **AUTHORIZED RESPONSE TO DIRECTOR REVIEW REQUEST** and all exhibits/attachments thereto were served in their entirety via electronic mail on the following attorneys of record:

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Dated: April 16, 2026

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