

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

**KOHLER CO.,
Petitioner,**

v.

**DELTA FAUCET CO.,
Patent Owner.**

Case No. IPR2024-00700

U.S. Patent No. 10,393,363

**PETITIONER'S HEARING DEMONSTRATIVES
July 10, 2025**

Overview of Argument

Introduction

Tseng Renders Claims 1 and 10 Obvious

Motivation to Combine Tseng with Mizuno / Schneider

Tse Renders Claims 1 and 19 Obvious

Motivation to Combine Tseng with Carter

Secondary considerations

Overview of the 363 Patent

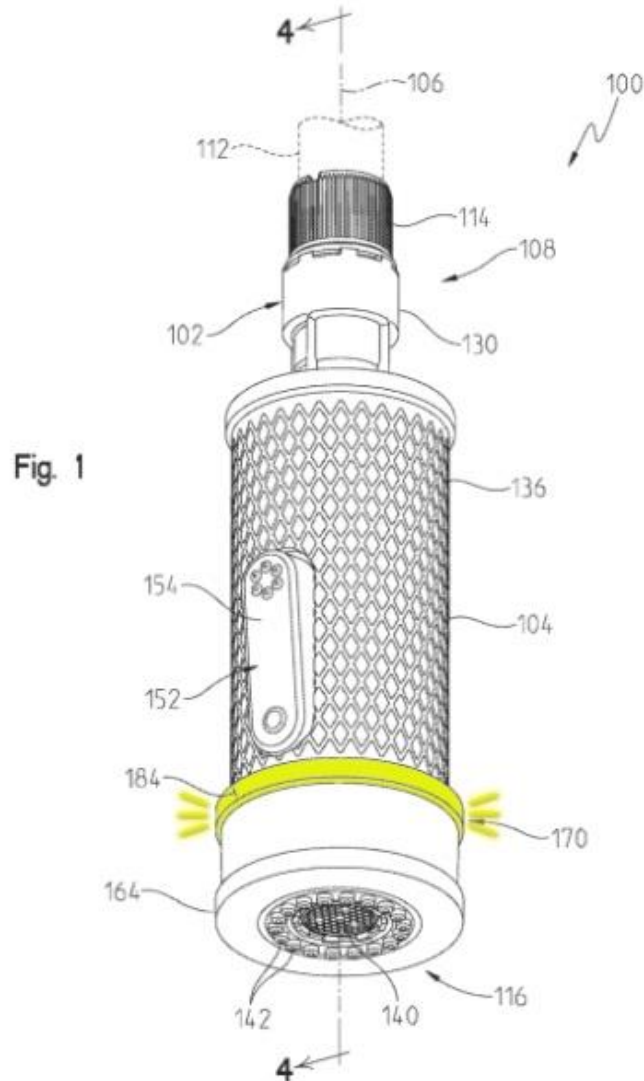
The present invention relates to fluid delivery devices and, more particularly, to an illumination device for a sprayhead.

Illumination devices associated with fluid delivery devices are known. Such illumination devices may include indicator lights for providing a visual indication of a status or a condition of fluid delivery device and/or water flowing from the fluid delivery device, and nightlights associated with lavatory faucets. Such illumination devices typically include a single light source, or a plurality of light sources providing for discrete areas of illumination (i.e. “hot spots”).

The present disclosure provides for an illumination device associated with a sprayhead that provides a light pipe illuminated by at least one light emitter. Illustratively, the sprayhead may comprise a pull-down sprayhead configured to be releasably coupled to a delivery spout of a faucet, or a pendant showerhead configured to be suspended downwardly from a ceiling in a shower stall.

*Ex. 1001 (363 patent), 1:16-34;
see also Paper 1 (Petition) at 7-8.*

Claim 10 of the 363 Patent



10. A pull-down sprayhead for a faucet, the sprayhead comprising:
a housing defining a longitudinal axis extending between a proximal end and a distal end;
a waterway received within the housing;
a sprayface fluidly coupled to the waterway and defining a water outlet; and
an illumination device supported by the housing, the illumination device including a substrate, a plurality of light emitters supported by the substrate, and a translucent light pipe including an outer illumination surface extending perpendicular to the longitudinal axis of the housing, the translucent light pipe defining a closed loop to diffuse light from the light emitters outwardly to the outer illumination surface.

*Ex. 1001 (363 patent), claim 10, Fig. 1;
see also Paper 1 (Petition) at 1-2.*

Claim 19 of the 363 Patent

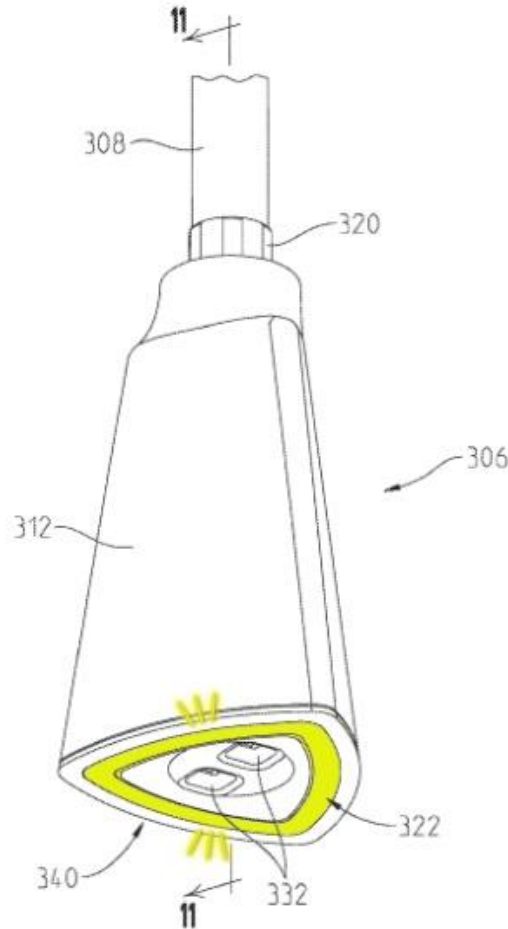


Fig. 8

19. A pendant showerhead comprising:
a housing defining a longitudinal axis;
a waterway received within the housing;
a sprayface fluidly coupled to the waterway and including a water outlet; and
an illumination device supported by the sprayface, the illumination device including a substrate, a plurality of light emitters supported by the substrate, and a translucent light pipe defining a closed loop surrounding the water outlet to diffuse light from the light emitters outwardly in a direction parallel to the longitudinal axis.

*Ex. 1001 (363 patent), claim 19, Fig. 8;
see also Paper 1 (Petition) at 3.*

The Petition's Grounds

Ground	Prior Art	Claims
1	Tseng	1-5, 10, and 12-16 obvious
2	Tseng + Mizuno	9 and 11 obvious
3	Tseng + Schneider	17 and 18 obvious
4	Tse	1, 6-9, and 19-23 obvious
5	Tse + Carter	1, 6-9, and 19-23 obvious
6	Tse (or Tse + Carter) + Spangler	24 obvious

Paper 1 (Petition) at 6-7.

Overview of Tseng

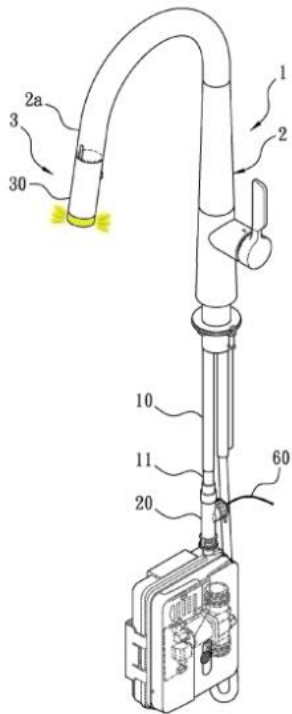
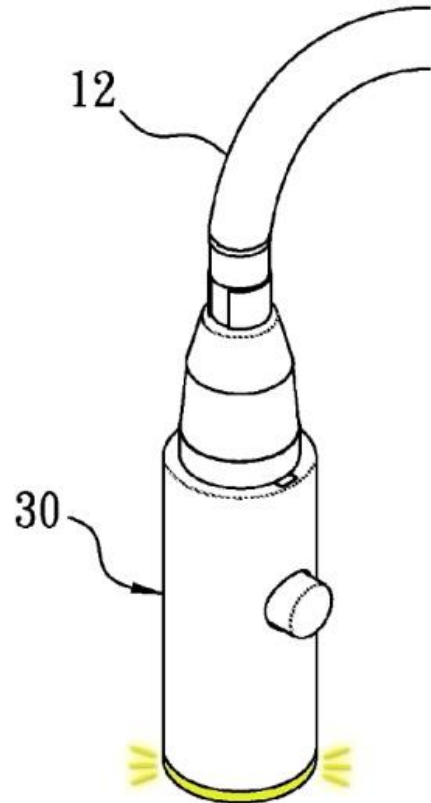


FIG. 1



[0001] The present invention relates to a faucet, and more particularly to a pull-out faucet which contains a shower assembly to illuminate lights.

[0070] The spray head 30 includes a light conductor 31 made of translucent material to guide lights, as shown in FIGS. 7 to 10, the light conductor 31 has plural input faces 311 for inputting the lights, a light transmission portion 312 for transmitting the lights, and an output face 313 for outputting the lights.

*Ex. 1004 (Tseng), ¶¶ [0001], [0070]; Figs. 1, 3;
see also Paper 1 (Petition) at 14-15.*

Overview of Tse

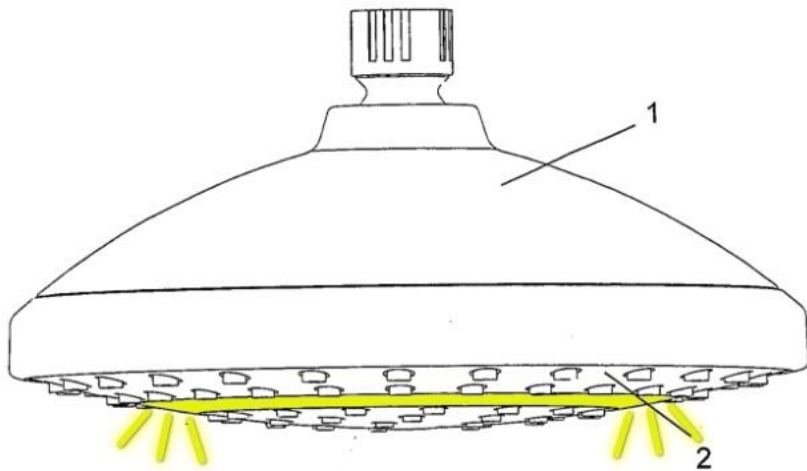


Fig. 1

The present invention relates to shower fixtures and more particularly pertains to a shower head with a light emitting means.

As shown in FIG. 4, the light emitting means 3 is disposed in the groove 22 of the perforated member 21 and sealed by the cover 23 of the groove 22. The light emitting means 3 is connected to the printed circuit board 9 by an insulated conductive wire (not shown) and an o-ring 31 is used as a water seal to make the point of connection watertight. The cover 23 of the groove 22 of the perforated member 21 is made of transparent or semi-transparent material so that the light emitted by the light emitting means 3 can be seen. In this

Ex. 1005 (Tse), 1:4-5, 6:23-29; Fig. 1; see also Paper 1 (Petition) at 18-19, 58-60.

Other Prior Art At Issue

- **Carter**: teaches “illuminated plumbing fixtures” with “a molded in place integrated light pipe”

Ex. 1006 (Carter), ¶ [0003]

- **Mizuno**: teaches a “faucet with an LED illumination lamp” powered by “a hydroelectric generator”

Ex. 1007 (Mizuno), ¶ [0001]

- **Schneider**: teaches a “kitchen ... faucet” with a light that is “variable ... in response to a change in water temperature”

Ex. 1009 (Schneider), ¶¶ [0002]-[0003]

- **Spangler**: teaches “multi-dimensional fluid dispensers” for “showerheads”

Ex. 1014 (Spangler), ¶¶ [0001]

see also Paper 1 (Petition) at 20-22.

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Secondary considerations

Patent Owner Repeatedly Tried to Negate Tseng's Disclosure

Patent Owner:

- X Argues that Tseng does not employ “translucent material.”
- X Argues that Tseng does not “diffuse light ... outwardly” to an “outer illumination surface.”
- X Accuses the Petition of improperly combined embodiments.

Tseng:

- Translucent material is the **only** light conductor material Tseng identifies.
- Tseng's light conductor includes an outwardly facing “annular protrusion 383” that **contributes** to illumination
- **All** of Tseng's embodiments are meant to use the same material and emit light in the same way: no combination is necessary.

Paper 22 (Reply) at 2-12.

The Only Light Conductor Material Mentioned in Tseng is a Translucent Material

[0070] The spray head 30 includes a light conductor 31 made of translucent material to guide lights, as shown in FIGS. 7 to 10, the light conductor 31 has plural input faces 311 for inputting the lights, a light transmission portion 312 for transmitting the lights, and an output face 313 for outputting the lights.

*Ex. 1004 (Tseng), ¶ [0070];
see also Paper 1 (Petition) at 14-15.*

All of Tseng's Embodiments Employ the Same Type of Light Conductor

[0011] The spray head includes a light conductor, and the light conductor has at least one input face for inputting lights, at least one light transmission portion for transmitting the lights, and at least one output face for outputting the lights.

*Ex. 1004 (Tseng), ¶ [0011];
see also Paper 1 (Petition) at 28; Reply (Paper 22), 3.*

All of Tseng's Embodiments Operate in the Same Way

1st Embodiment:

[0079] Referring further to FIGS. 5, 7 and 10, each slot 318 of the peripheral fence 314 of the light conductor 31 further has a first stopping portion 31b arranged on an upper side of an outer wall thereof and has a second stopping portion 31c arranged on a lower side of the outer wall thereof to close the internal sleeve 33, thus stopping the water flowing into the outer room 327 of the conduit member 32 and penetrating to the plurality of LED elements 40 and the circuit board 50 between the first stopping portion 31b and the second stopping portion 31c. The light conductor 31 further has a circular rib 31d extending outwardly from a lower side of an outer wall of the second stopping portion 31c opposite to the internal sleeve 33 and the external sleeve 34, such that the circular rib 31d exposes outside to enhance illumination effect.

2nd Embodiment:

[0094] The peripheral fence 361 of the guiding member 36 has a first stopping portion 365 disposed above the first gap 363 thereof, and the peripheral fence 361 also has a second stopping portion 366 defined between the first gap 363 and the second gap 364 of the peripheral fence 361, such that the first stopping portion 365 and the second stopping portion 366 contact with an inner wall of an internal sleeve 33, thus stopping water flowing into an outer room 327 of the conduit member 32 and penetrating to the plurality of LED elements 40 and the circuit board 50 between the first stopping portion 365 and the second stopping portion 366. A top end of the circular rib 371 of the light conductor 37 is opposite to a bottom end of the second stopping portion 366, a bottom end of the internal sleeve 33, and a bottom end of an external sleeve 34, such that the circular rib 371 exposes outside to enhance light transmission and illumination.

3rd Embodiment:

[0098] To enhance light transmission, the outer cliff 381 of the light conductor 38 has an annular protrusion 383 extending outwardly adjacent to the bottom end thereof to contact with a bottom end of an external sleeve 34.

*Ex. 1004 (Tseng), ¶¶ [0079], [0094], [0098];
see also Paper 1 (Petition) at 31; Paper 22 (Reply) at 4.*

Tseng Details How Its Embodiments Differ: There Is **No Mention** of Different Materials

2nd Embodiment:

[0090] With reference to FIGS. 27 to 29, a difference of a pull-out faucet of a second embodiment from that of the first embodiment comprises: a guiding member 36, wherein the conducting member 36 does not conduct and penetrate the lights, so it does not have the plural input faces 311, the light transmission portion 312, and the output face 313 of the light conductor 31 of the first embodiment.

[0091] Referring further to FIGS. 30 and 31, the pull-out faucet of the second embodiment further includes a light conductor 37 disposed on a peripheral side of the guiding member 36, and the light conductor 37 has a circular rib 371 and plural light columns 372 extending upwardly from an inner wall of the circular rib 371, wherein each light column 372 has an input face 311 formed on a top end thereof, and bottom ends of the plural light columns 372 and a bottom end of the circular rib 371 define at least one output face 313, the plural light columns 372 form at least one light transmission portion 312.

3rd Embodiment:

[0096] With reference to FIGS. 32 to 37, a difference of a pull-out faucet of a third embodiment from that of the second embodiment comprises:

[0097] a light conductor 38 formed in a sleeve shape to retain with a guiding member 39, wherein the light conductor 38 has an outer cliff 381, and the outer cliff 381 has plural indentations 382 arranged around a middle section thereof, wherein each indentation 382 has an input face 311 formed on a bottom end thereof, and the outer cliff 381 also has an output face 313 defined on a bottom end thereof. In addition, the outer cliff 381 among input faces 311 of the plural indentations 382 and the output face 313 forms a light transmission portion 312.

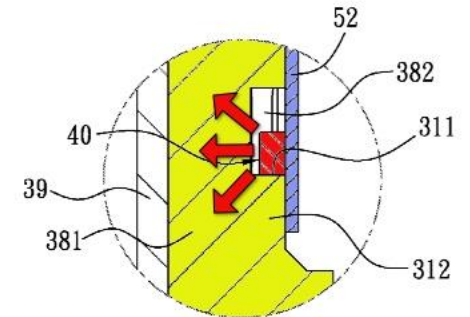
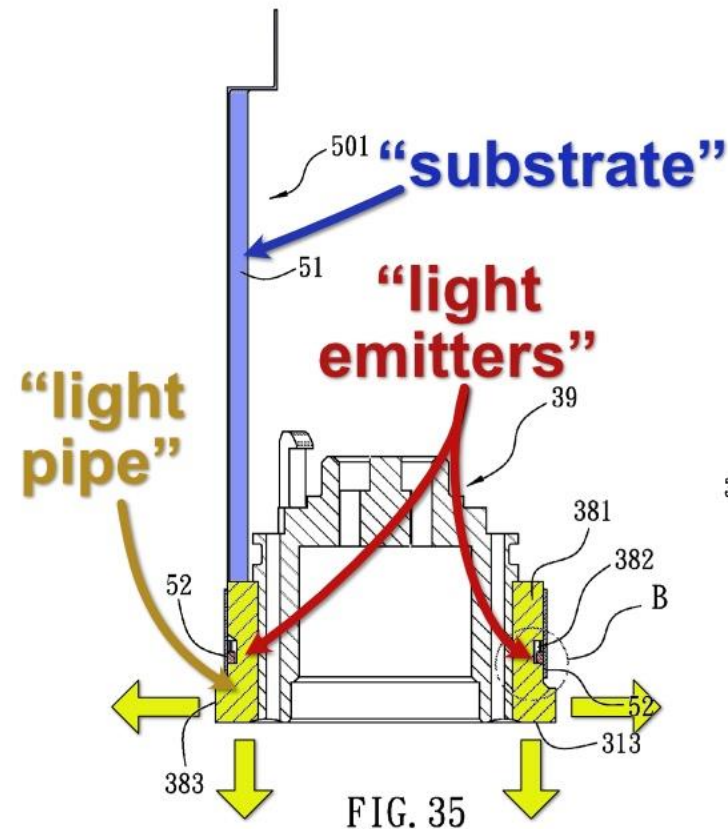
[0098] To enhance light transmission, the outer cliff 381 of the light conductor 38 has an annular protrusion 383 extending outwardly adjacent to the bottom end thereof to contact with a bottom end of an external sleeve 34.

*Ex. 1004 (Tseng), ¶¶ [0090]-[0091], [0096]-[0098];
see also Paper 22 (Reply) at 3-4.*

Patent Owner Deprives Tseng's "Annular Protrusion 383" of Purpose

[0097] a light conductor 38 formed in a sleeve shape to retain with a guiding member 39, wherein the light conductor 38 has an outer cliff 381, and the outer cliff 381 has plural indentations 382 arranged around a middle section thereof, wherein each indentation 382 has an input face 311 formed on a bottom end thereof, and the outer cliff 381 also has an output face 313 defined on a bottom end thereof. In addition, the outer cliff 381 among input faces 311 of the plural indentations 382 and the output face 313 forms a light transmission portion 312.

[0098] To enhance light transmission, the outer cliff 381 of the light conductor 38 has an annular protrusion 383 extending outwardly adjacent to the bottom end thereof to contact with a bottom end of an external sleeve 34.

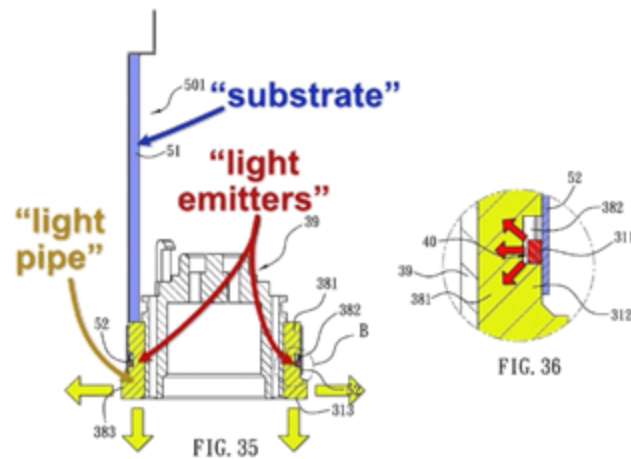


Ex. 1004 (Tseng), ¶¶ [0097]-[0098]; Figs. 35-36; see also Paper 1 (Petition) at 31-32; Paper 22 (Reply) at 5-6.

Petitioner's Expert **Did Not** Testify That Tseng's LED Light **Only** Emanates Downward

173. The relative positioning of LED elements within Tseng's housing and the light output faces emphasizes this operation.

174. For example, as shown in Figures 35 and 36, **LEDs 40 face inward and emit light towards the center of the spray head (red arrows).** Faces 313 and 383, **however, emit light outwards (yellow arrows).** In this regard, Tseng explains that "face 313" is an "output" face, and that "protrusion 383" "enhance[s] light transmission." (*Id.*, ¶¶ [0097], [0098].)



(*Id.*, Figs. 35, 36 (annotated).)

175. In my opinion, because faces 313 and 383 are oriented in different directions than LEDs 40, **a POSITA would have understood that Tseng's light conductor engages in internal light diffusion and reflection to transmit the light emitted from the LEDs through (and eventually out of) the conductor.** Because this occurs, the light conductor both conducts light (its intended purpose) and operates to enhance light transmission and illumination as Tseng teaches.

Ex. 1003 (Cook Dec.), ¶¶ 173-175; see also Paper 1 (Petition) at 31-32.

Patent Owner's Expert *Did Admit* That At Least Some Light Will Emanate From Tseng's Sides

MR. HERMAN: Q. Now, looking at Figure 32, is it your opinion that absolutely no light whatsoever emitted by LEDs 40 will make its way to the side surface to which item number 383 is pointing?

MR. ISRAELSEN: Objection.

THE WITNESS: I -- I don't think I could say that.

MR. HERMAN: Q. So at least some light will make its way to that side surface, in your view; true?

MR. ISRAELSEN: Objection.

THE WITNESS: Well, according to the, say, paragraph 98, the rib is extending outwardly to enhance light transmission. And a person of ordinary skill in the art would understand that the reason to do that is to get it out of the way of the down-coming light. That is not to say that some photons would not leak -- because nothing is perfect -- would leak or

scatter, even, in a trans- -- transparent material and reach that surface 383.

MR. HERMAN: Q. So even if the material was transparent, some photons would make their way to surface 383; correct?

MR. ISRAELSEN: Objection.

THE WITNESS: I think that is believable.

MR. HERMAN: Q. Now, if the material that the light conductor is made out of is translucent, would light photons also make their way to surface 383?

MR. ISRAELSEN: Objection.

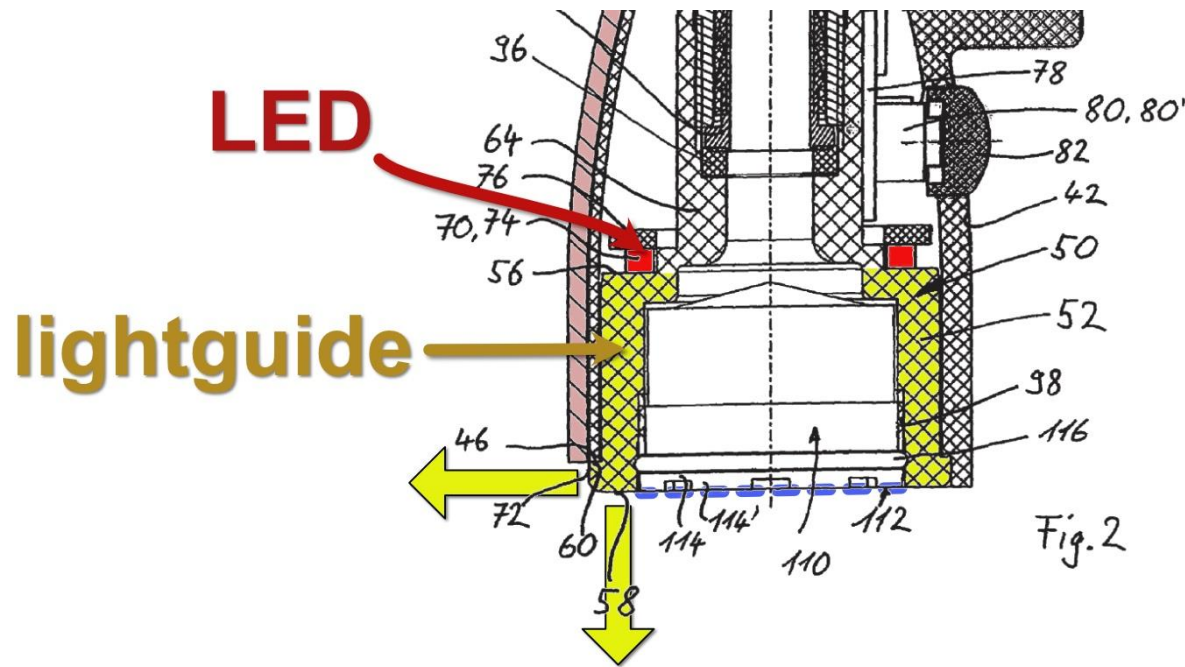
THE WITNESS: Well, you would lose enhanced illumination. But again, no one could say that no photons at all would reach 383.

*Ex. 1015 (Klopp Depo.), 36:9-37:15
see also Paper 22 (Reply) at 7.*

Patent Owner's Expert Is **Contradicted** by the Very Evidence on Which He Relies

120. A POSITA would have reviewed the '874 patent to further understand the problems Tseng addresses, and while doing so, would have also recognized

Ex. 2003 (Klopp Dec.), ¶ 120



A light source 70 is arranged, preferably so as to bear directly against the input face 56 of the outflow pipe 50. The light from the light source 70 which is input at the input face 56 is transmitted by the light transmission region 52 to the end face 58, and is at least partially output from the outflow pipe 50 at the end face 58. Moreover, light may also be output from the outflow pipe 50 in the region of the exposed outer surface area 72 between the shoulder 60 and the end face 58, apart from in the region of the bead 42.

*Ex. 2009 ('874 Patent), 3:51-62; Fig. 2;
see also Paper 22 (Reply) at 8-9.*

Patent Owner Concedes That Light Moves Perpendicularly Through Tseng's Light Conductor

¶98. Moreover, Tseng explains, as shown in Figures 32 (below) and 36 (above), the side of the outer cliff 381 is covered by C-shaped ring 52, **internal sleeve 33**, and **external sleeve 34**, which would block light transmission in the perpendicular direction. Neither the Petition nor Mr. Cook addresses *why* a POSITA would have thought that—even if Tseng's light conductor 38 were a light pipe, as the Petition alleges—light moving vertically through Tseng's light conductor 38 would have leaked out the side of annular protrusion 383, rather than continuing to move vertically in the direction of light conductor 38. Ex. 1003, ¶¶38-41. **The vertical movement of light would have been further enhanced by Tseng's internal and external sleeves that would block any perpendicular light from leaking, and thereby further directing light toward bottom output face 313.**

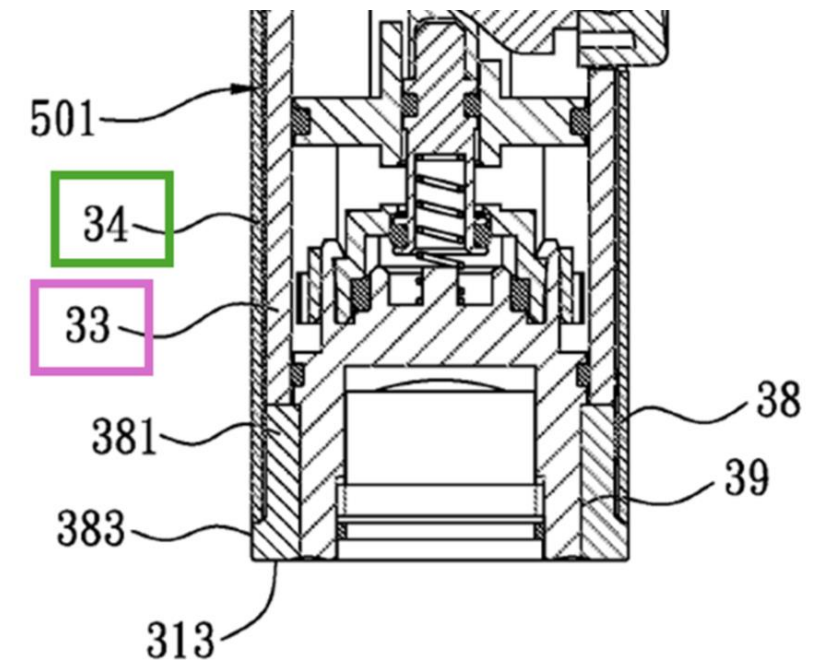


FIG. 32

Paper 17 (Response) at 32-33.

The Petition Explained the Interrelation Between Tseng's Embodiments

Tseng includes three embodiments with slightly different internal structures. Figures 5, 27, and 32 respectively provide cross-sectional views of these embodiments. (*Id.*, ¶¶ [0035], [0057], [0062].) In the first embodiment, a light emitting element is integrated with the spray head's water outlets. In contrast, the second and third embodiments include a light element that is separate from the water outlets. (*See, e.g.*, ¶¶ [0090], [0096]-[0097].) This petition focuses on the second and third embodiments. But because Tseng's three embodiments are overlapping and have numerous common structural features—many of which are discussed only in the context of the first embodiment—this petition also cites to certain first embodiment passages.

Paper 1 (Petition) at 15.

Overview of Argument

Introduction

Tseng Renders Claims 1 and 10 Obvious

Motivation to Combine Tseng with Mizuno / Schneider

Tse Renders Claims 1 and 19 Obvious

Motivation to Combine Tseng with Carter

Secondary considerations

Tseng Mentions only the *Downsides* of Wired Power Supplies

[0009] The primary objective of the present invention is to provide a pull-out faucet which is assembled easily and quickly, decreases its production cost, avoids damage an electric wire in the pull-out faucet, and illuminates lights from a shower assembly.

*Ex. 1004 (Tseng), ¶ [0009];
Paper 22 (Reply) at 14.*

Mizuno's Generator Is *Designed* to Fit in a Sprayhead And Solve Problems with Existing Wiring

[0001]

[Technical Field of the Invention] The present invention relates to a faucet with an LED illumination lamp and more particularly relates to a faucet provided with a hydroelectric generator.

[0002]

[Conventional Art and Problem to be Solved by the Invention] Conventionally, various types of faucet have been installed in water-running hygiene equipment rooms such as kitchens and washrooms.

[0004] Conventionally, attaching this type of illumination lamp to a faucet has been proposed, but conventional arts extend electrical wiring to connect an external power source to the illumination lamp and supply power to light up the lamp, or alternatively, mount a battery in the faucet, for example, in the spout thereof, and use this as a power source to light up the illumination lamp, and therefore both have problems as follows.

[0005] That is, the former requires electrical wiring work for supplying power from an external power source, so there is a problem of taking time and effort in the construction, and an illumination function cannot be easily provided to the faucet. Furthermore, in the latter, there is a problem that, in association with mounting the battery, a battery mounting portion in the faucet, for example, a periphery of the spout thereof when mounting the battery in the spout, becomes large, as well as a problem of a high running cost and maintenance taking effort because the battery must be periodically replaced.

*Ex. 1008 (Mizuno), ¶¶ [0001]-[0002], [0004]-[0005];
Paper 1 (Petition) at 44-46; Paper 22 (Reply) at 15.*

The Petition Explained How Schneider and Tseng Would Be Combined

During operation, Schneider’s “temperature sensor 22 will measure the temperature of the water” passing through the faucet “and send a signal to controller 24.” (*Id.*, ¶¶ [0040]-[0041].) The “controller 24” then uses the temperature signal “to adjust the color” of the faucet’s display. (*Id.*) This can be accomplished by, for instance, selectively activating one or more “light emitting diode[s]” like a “blue LED” or a “red LED.” (*Id.*, ¶ [0036]; *see also* Ex. 1003, ¶¶ 276-284.)

Again, applying these teachings to Tseng results in a faucet with a sprayhead satisfying the claims. Tseng’s sprayhead would include a “*temperature sensor*” (Schneider’s sensor 22) that measures the temperature of water passing through the sprayhead’s internal “*waterway*.” It would also include a “*controller*” (Schneider’s controller 24) that receives a signal from the temperature sensor and uses it to control the color of Tseng’s LEDs. (*See id.*, ¶¶ 285-287.)

Paper 1 (Petition) at 48-49.

Overview of Argument

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Motivation to Combine Tseng with Mizuno / Schneider

Tse Renders Claims 1 and 19 Obvious

Motivation to Combine Tseng with Carter

Secondary considerations

Patent Owner Not Only Ignores the Art But Also Misconstrues the Claims

Patent Owner:

- X Argues that Tse's LED cover is not a "light pipe."
- X Misconstrues the claims as requiring all water outlets to be "surround[ed]" by the claimed "light pipe."

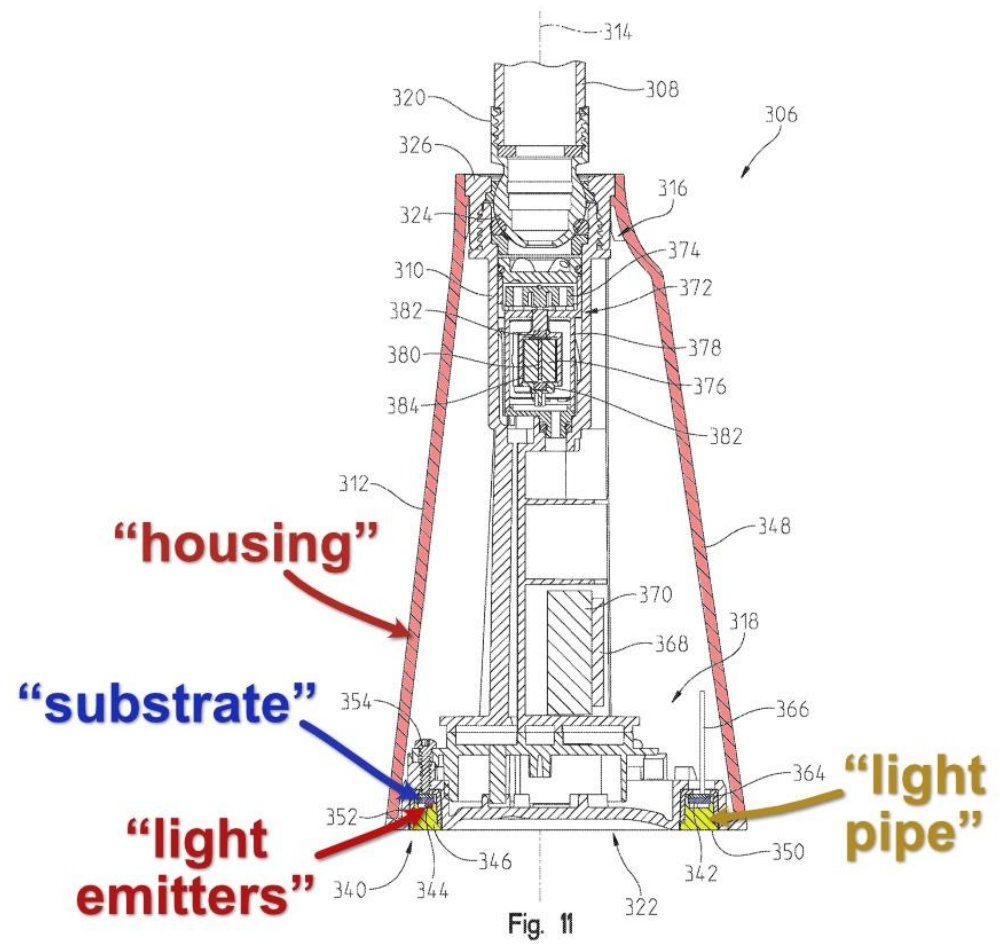
Tse:

- Tse's cover is (1) **indistinguishable** from the 363 patent's own example and (2) would obviously be designed to **diffuse** light.
- The claims require only a **single** water outlet to be surrounded by the light pipe.

Paper 22 (Reply) at 17-20.

The 363 Patent's Light Pipe Is Structurally Indistinguishable from Tse's Cover

363 Patent



Tse

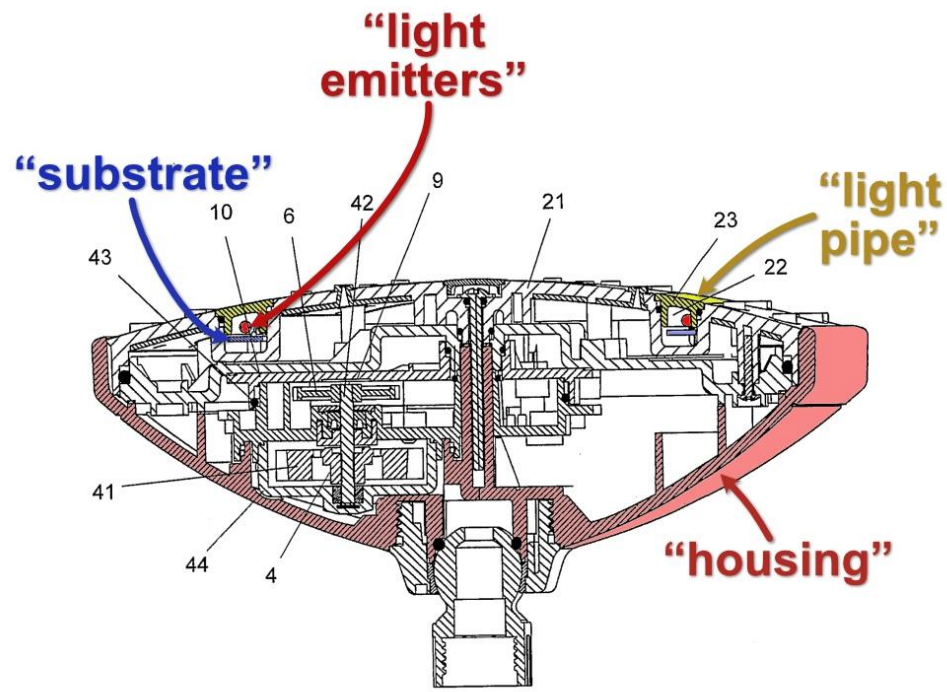


Fig. 7

Ex. 1001 (363 patent), Fig. 11; Ex. 1005 (Tse), Fig. 7;
see also Paper 1 (Petition) at 60-61.

Tse's Showerhead Would Obviously Be Designed to Emit Diffuse, Uniform Light

provide current and turn on the light emitting means 3. The light emitting means 3 emits color light and make the water coming out from the perforated member 21 having the same color. Therefore, a user can have visual enjoyment of the color light while showering. Further, as the water flow is stronger, higher

*Ex. 1005 (Tse), 8:20-23;
see also Paper 1 (Petition) at 64.*

Only a Single Water Outlet Is Required to Be “Surround[ed]”

19. A pendant showerhead comprising:
a housing defining a longitudinal axis;
a waterway received within the housing;
a sprayface fluidly coupled to the waterway and including
a water outlet; and
an illumination device supported by the sprayface, the
illumination device including a substrate, a plurality of
light emitters supported by the substrate, and a trans-
lucent light pipe defining a closed loop surrounding the
water outlet to diffuse light from the light emitters
outwardly in a direction parallel to the longitudinal
axis.

*Ex. 1001 (363 patent), claim 19;
see also Paper 1 (Petition) at 59; Paper 22 (Reply) at 20.*

Overview of Argument

Introduction

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Tse Renders Claims 1 and 19 Obvious

Motivation to Combine Tseng with Carter

Secondary considerations

Carter is Analogous Art: It Is From the Same Field of Endeavor as the 363 Patent

363 Patent

The present invention relates to fluid delivery devices and, more particularly, to an illumination device for a sprayhead.

Ex. 1001 (363 patent), 1:16-18

Carter

[0003] The present invention relates generally to the field of illuminated plumbing fixtures. More specifically, the present invention is a plumbing fixture including a molded in place integrated light pipe feature for components used both above and below the waterline in spas, pools and all related recreational water products

[0007] The present invention overcomes the drawbacks of the prior art by combining simplicity and ruggedness into a single feature adaptable to a variety of plumbing fixtures. In

*Ex. 1006 (Carter), [0003], [0007];
see also Paper 1 (Petition) at 73; Paper 22 (Reply) at 21-22.*

Carter is Analogous Art: It Addresses the Same Problem as the 363 Patent

363 Patent

with lavatory faucets. Such illumination devices typically include a single light source, or a plurality of light sources providing for discrete areas of illumination (i.e. “hot spots”).

housing. The illumination device includes a substrate, a plurality of light emitters supported by the substrate, and a translucent light pipe defining a closed loop to diffuse light from the light emitters outwardly away from the housing. A

Ex. 1001 (363 patent), 1:24-26, 40-43

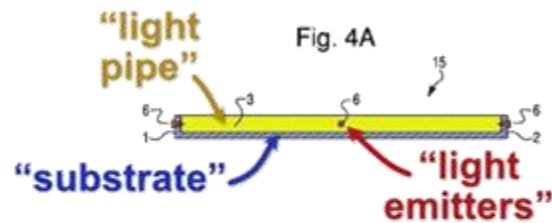
Carter

[0008] The light pipe layer functions as an integrated light pipe and thusly allows an applied light to be dispersed across the part either partially or completely. The light pipe is

*Ex. 1006 (Carter), [0008];
see also Paper 1 (Petition) at 73; Paper 22 (Reply) at 22.*

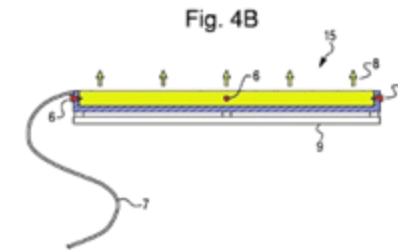
The Petition Explained How Carter Would Be Applied to Tse

[0026].) Figure 4A provides an example of a “unidirectional lighting element array 15.” (*Id.*, ¶ [0019].) A series of “lighting elements 6” (red) are mounted on a “substrate ... 1” (blue). (*Id.*, ¶¶ [0018]-[0019].) Then, a “light piping feature 3” (yellow) is applied over the lighting elements/substrate. (*Id.*, ¶ [0019].)



(*Id.*, Fig. 4A (annotated).) Use of the light pipe allows light to be “transmitted up and through the molded in place integrated light pipe 3” such that can be

“disbursed across a partial or complete exposed surface area” “as indicated by arrows 8” (yellow). (*Id.*, ¶¶ [0019], [0025].)



(*Id.*, Fig. 4B (annotated).) Applying this to Tse results in the claimed subject matter: cover 23 would be replaced with an integrated, molded light pipe that diffuses light from Tse’s LEDs out of the face of perforated member 21. (Ex. 1003, ¶¶ 413-422.)

Paper 1 (Petition) at 70-71

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Secondary considerations

Patent Owner Has Failed to Satisfy Its Burden of Production

- X ***No proof of a nexus.*** Patent owner performed no limitation-by-limitation analysis. It points to product pictures from marketing materials with no further explanation.
- X ***No “long felt need.”*** Patent Owner points to nothing besides the fact that it obtained a patent.
- X ***No “praise.”*** Patent Owner merely cites a small handful of random, anonymous user reviews from one retailer’s website.

IPR2023-00987, Paper 29 (Reply) at 23-24