

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VECTAIR SYSTEMS INC.,
Petitioner

v.

FRESH PRODUCTS, INC.,
Patent Owner

Case: IPR2024-00824
Patent No. 10,145,098

**PETITIONER'S RESPONSE TO ORDER TO CORRECT DEFECTS -
EXHIBITS**

EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 10,145,098 to Brown et al. (“’098 Patent”)
1002	Prosecution File History of US 10,145,098
1003	Reserved
1004	Merriam-Webster Online Dictionary, Definition of “OPENING”, screen print of https://www.merriam-webster.com/dictionary/opening , accessed April 5, 2024
1005	Fresh Products 3WDS60SAP Wave 3D Urinal Deodorizer Screen, First Available May 10, 2013 (Publication – Amazon Sale Listing, https://www.amazon.com/Fresh-Products-3WDS60SAP-Deodorizer-Fragrance/dp/B00MX5A9ME/ref=sr_1_1?crid=2CL9U8NCPU5DM&dib=eyJ2Ijo1MSJ9.krJ4D4nCD80Wze_uhxiUIUI_eboiAlc2mFujJQ9DCXY.7N68cOdHtLxs63BsJVx3nLebzTdTSH5SjG3gomDnXgA&dib_tag=se&keywords=fresh+products+3WDS60SAP+Wave+3D&qid=1713291600&sprefix=fresh+products+3wds60sap+wave+3d%2Caps%2C154&sr=8-1, accessed April 5, 2024) Excerpt from Ex. 1005 for publication date of May 10, 2013 below: Product details Is Discontinued By Manufacturer : No Product Dimensions : 0.67 x 6.5 x 0.67 inches; 11.85 ounces Item model number : FRE-3WDS-F-010I060M-01-10PK Date First Available : May 10, 2013 Manufacturer : FRESH PRODUCTS ASIN : B00MX5A9ME Country of Origin : USA Best Sellers Rank: #68,766 in Industrial & Scientific (See Top 100 in Industrial & Scientific) #76 in Janitorial Deodorizers Customer Reviews: 4.4 ★★★★★ ~ 115 ratings (“FP 3WDS60SAP Wave 3D”)
1006	Fresh Products Wave 3D, First Available September 3, 2013, (Publication – Amazon Sale Listing, https://www.amazon.com/Fresh-Products-Wave-Freshener-Deodorizer/dp/B07NZT13XC/ref=sr_1_3?crid=2ZOGTIZKW1MIX&dib=eyJ2Ijo1MSJ9.rXwVv5SKjy4dCwJsU4wqDdC4Yagfa7eeQ4OXXRmEOMolFXjO5YwVY91mJHV6IVXWz6I026hrGtH1uQkJxKotkt4oPTH8hvxBMjXmsu9xX3H-6DVYSMxn_6AryFy2RHvGKF1-7BCc2epekm26N4PuyMenXlHdk6TmTjIVppE-zQS3LQ9AF9rCzflnQD8-6ld22o2iggaVV4xoD9hp8L72K9wCRJcndAtl2GEwt3W9Ruc.H_xbW2qRoB4IAaPUNLJ-MZbQQaXsPLiCAePA-j_rjAM&dib_tag=se&keywords=fresh+products+wave+3d+urinal+deodorizer+screen+mango&qid=1713307164&sprefix=fresh+products+wave+3D+mango+urinal+%2Caps%2C880&sr=8-3, accessed April 5, 2024), Excerpt from Ex. 1006 for publication date of September 3, 2013 below:

Petition for *Inter Partes* Review of U.S. Patent No. 10,145,098

	Product details Product Dimensions : 7 x 6.5 x 0.66 inches; 4.31 ounces Item model number : 3WDS-F-010I060M-04 Date First Available : September 3, 2013 Manufacturer : Fresh Products ASIN : B07NZT13XC Country of Origin : USA Best Sellers Rank: #1,915 in Industrial & Scientific (See Top 100 in Industrial & Scientific) #7 in Janitorial Deodorizers Customer Reviews: 4.5 ★★★★★ 210 ratings (“FP Wave 3D”)
1007	Cease and Desist Letter from Patent Owner, Fresh Products, asserting ‘098 Patent against Petitioner, dated November 7, 2023
1008	Big D Industries, Inc. Product Catalog, copyright 01/2013 (Big D Catalog)
1009	Big D Industries, Inc. ordering information and cut Sheet for “The Pearl 3D” copyright 09/2013 (Big D Pearl 3D)
1010	Perspective View and Elevational View Renderings of The Pearl 3D as shown in Ex. 1007 and Ex. 1009.
1011	U.S. Patent No. 8,007,707 to Brown et al. (“’707 Patent”)
1012	Korean Patent Publication No. 20-0395055 (“KR’055”)
1013	English Translation of Korean Patent Publication No. 20-0395055, published 2005-09-01 (“KR’055 English”)
1014	Fresh Products, January 2013 Catalog, printed publication including Wave 2.0 urinal deodorizer (“FP Catalog Wave 2.0”)
1015	Fresh Product October 17, 2013 website (freshproducts.com) advertisement for Wave 2.0, archived website from archives.org, https://web.archive.org/web/20131017043205/http://freshproducts.com/index.php/wave-2-0, accessed April 16, 2024 (“Wave 2.0”)
1016	Fresh Products Technical Specifications (Item Codes), screenshot of https://freshproducts.com/products/urinal-screens/wave-3d-urinal-screen/, accessed April 16, 2024.
1017	Vectair V-Screen urinal screen, publication dated March 13, 2013, European Cleaning Journal entry for V-Screen, screenshot of https://www.europeancleaningjournal.com/magazine/february-march-2013/product-review/vectair-vs-screen-urinal-screen-range-expanded, accessed April 18, 2024.
1018	Vectair V-SCREEN information, printed publication, copyright 2012 showing and describing V-SCREEN urinal screen.

Respectfully submitted,

WESTMAN, CHAMPLIN & KOEHLER, P.A.

Petition for *Inter Partes* Review of U.S. Patent No. 10,145,098

/Z. Peter Sawicki /

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