UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC, CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS,
VERIZON CORPORATE SERVICES GROUP INC.,
T-MOBILE USA, INC., SPRINT LLC F/K/A SPRINT CORP.,
AND AT&T SERVICES, INC.,
Petitioner,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

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IPR2024-00942
Patent 8,589,541

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**PATENT OWNER'S RESPONSE**

In the district court actions against Petitioners (*see* Pet. 82—"Related Matters"), Patent Owner has narrowed its assertions of U.S. Patent No. 8,589,541 to only claims 79 and 83, neither of which are challenged in this IPR proceeding. Accordingly, to conserve resources, Patent Owner does not provide a substantive discussion of the Petition's invalidity grounds. However, Petitioners must still meet their burden of proof, and Patent Owner does not believe that Petitioners have done so for any claim.

Date: February 26, 2025

Respectfully submitted,

/James A. Milkey/

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**CERTIFICATION REGARDING WORD COUNT**

Pursuant to 37 C.F.R. §42.24(d), Patent Owner certifies that there are 78 words in the paper excluding the portions exempted under 37 C.F.R. §42.24(a)(1).

Date: February 26, 2025

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**CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))**

The undersigned hereby certifies that the above document was served on February 26, 2025, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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