

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner,

v.

CROG INNOVATIONS LTD.,

Patent Owner.

Case IPR2024-01196

Patent 10,601,780

PATENT OWNER'S PRELIMINARY RESPONSE

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2002	Order, <i>MyPort, Inc. v. Samsung Electronics Co., Ltd., et al.</i> , No. 2:22-cv-00114-JRG (E.D. Tex. June 12, 2023)
2003	Defendants' Invalidation Contentions, <i>Croga Innovations Limited v. Cisco Systems, Inc.</i> , No. 2:24-cv-00065-JRG (Lead Case) (E.D. Tex. August 5, 2024)
2004	Amended Docket Control Order, <i>Croga Innovations Ltd. v. Cisco Systems, Inc.</i> , No. 2-24-cv-00065, Dkt. 53 (E.D. Tex. July 18, 2024)
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I. INTRODUCTION

Patent Owner Croga Innovations Ltd. (“Patent Owner”) submits this preliminary response to Petitioner Cisco Systems Inc.’s (“Petitioner”) Petition for *inter partes* review of U.S. Patent No. 10,601,780 (“the ’780 patent”).

First, institution should be denied because Petitioner has not shown a reasonable likelihood of success on the merits. The Petition relies on alleged prior art that meaningfully differs from the claimed invention of the ’780 patent, and Petitioner’s attempt to map the asserted art to the claims relies on an implied claim construction that is entirely unsupported.

In addition, the Board should exercise its discretion to deny the petition in light of a parallel district court case involving the same patent, overlapping claims, much of the same prior art, and the same parties. By the time the Board reaches an institution decision in this proceeding, the parties and the district court will have already invested significant time and resources in the case which was filed on February 1, 2024 – over a year before the institution decision is due. Fact discovery is ongoing (including source code review). By the date of the institution decision,

the parties will have substantially completed document production and claim construction discovery. A Final Written Decision will not be due until four (4) months *after* trial is scheduled to begin on October 20, 2025. The *Fintiv* factors strongly favor a discretionary denial.

II. CLAIM CONSTRUCTION

Under 37 C.F.R. § 42.104(b), Petitioner was required to “identify how the challenged claim is to be construed.” Here, Petitioner offers no express construction of any challenged claim term, stating only that “no claim term requires express construction.” Pet. 12. Although not expressly stated, Petitioner appears to contend that the “ordinary and customary” meaning of each claim term applies. *Id.*

However as explained below, Petitioner’s mappings of the asserted art to the limitations *wherein an internal firewall is configured to separate the host system from the virtual system* (claim 1) and *separating the host system from the virtual system using an internal firewall* (claim 11) rely on implicit constructions of those terms without any support in the ’780 specification.

III. THE '780 PATENT

The '780 patent relates to a host computer system that supports a virtual guest system running thereon. EX1001 at 3:29-31. It discloses various techniques to allow “safe browsing without the risk of infection.” *Id.* at 3:6-8. According to the '780 specification, this is done by implementing a host-based firewall that allows the host to communicate only with “predetermined trusted sites” on the Internet and a virtual guest system comprising “a browser program that is allowed to contact the internet freely via an internet access connection that is completely separate from the host computer connection.” *Id.* at 3:29-42. “The guest computer and the host computer communicate with each other by a limited permissible internal host-based firewall.” *Id.* at 5:62-6:1. “Communications across this internal firewall between the guest system and the host system are limited to cut and paste of displayed documents or files, commands to print documents, and file transfer requested manually by the host.” *Id.* at 6:2-6. Because of this separation of the host and guest systems by the internal firewall, “the guest computer in the virtual machine has no access to the other computers on the network or

even to the system assets or files of the host system itself, except to cut, past, or print.” *Id.* at 6:22-27; EX2006 at ¶¶43-45.

Claim 1 of the ’780 patent recites three separate firewalls, each configured for specific functionality: (1) *a host-based firewall ... configured to implement network isolation between the computer system and the network*, (2) *a network firewall ... configured to implement network isolation between one or more untrusted network destinations and the networked computer system*, and (3) *an internal firewall ... configured to separate the host system from the virtual system*. EX1001 at 13:2-13. Thus, the claims themselves recite distinct firewalls configured to perform distinct functions, and expressly distinguish firewalls *configured to implement network isolation* from a firewall *configured to separate the host system from the virtual system*.

IV. DELCO DOES NOT DISCLOSE AN INTERNAL FIREWALL CONFIGURED TO SEPARATE THE HOST SYSTEM FROM THE VIRTUAL SYSTEM

The Petition presents two grounds of alleged unpatentability. Under each ground, Petitioner alleges that Exhibit 1005 (“Delco”) renders obvious *wherein an internal firewall is configured to separate the host system from the virtual system* (claim 1) and *separating the host*

system from the virtual system using an internal firewall (claim 11) based on Delco’s disclosure of “packet filter 74.” Pet. 38-41, 68. Petitioner presents no independent arguments for the claim 11 limitation, relying entirely on its arguments as to claim 1. *See* Pet. 68.

Delco’s packet filter 74 is not *an internal firewall [that] is configured to separate the host system from the virtual system*. Pet. 41. As Petitioner and its expert¹ acknowledge, Delco’s packet filter 74 operates to “filter out harmful packets from untrusted destinations such as the Internet.” Pet. 57; EX1005 at 2:26-59; EX1003 ¶¶131-135. To implement this packet filtering functionality, Delco discloses that packet filter 74 uses a set of policy rules based on the characteristics of the network

¹ The testimony of Petitioner’s expert as to the “internal firewall” limitation should be given little weight as, apart from a single extended quotation in ¶91, it merely repeats verbatim the assertion in the Petition it purportedly supports. *Compare* Pet. at 38-41 *with* EX1003 at ¶¶90-96; *see Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper No. 9 at 15 (PTAB Aug. 24, 2022) (precedential).

traffic. EX1005 at 8:33-38. For example, packet filter 74 may consider source and destination addressing (e.g., IP address), the transmission protocol (e.g., HTTP or TCP), the direction of network traffic, packet size, keywords in the headers or payload of a packet, and other factors. *Id.* at 8:38-57; EX2006 at ¶¶51-54.

In contrast to Delco, the '780 patent does not rely on an internal firewall to filter network traffic. Indeed, the '780 patent discloses that the virtual guest system is “allowed to contact the Internet freely” and can “communicate without restriction with any site on the Internet.” EX1001 at Abstract, 11:58-64. Network traffic passes through either the network firewall or the host-based firewall. EX1001 at 7:10-17, 7:49-62; EX2006 at ¶¶ 43-45. The '780 patent describes an internal firewall 15 that, instead of examining packets or filtering network traffic, “separates and restricts interaction between virtual system 13 and the trusted-host operating system 17.” EX1001 at 8:13-17; EX2006 at ¶ 46. It also describes, for example, interactions that are limited by the internal firewall to a defined set of permissible operations that access host resources (e.g., cut, copy, paste). *Id.* at 8:20-35; EX2006 at ¶¶ 46-47. Through the internal firewall, if the guest system is compromised, “the

guest computer in the virtual machine has no access to... the system assets or files of the host system itself, except to cut, paste, or print.” EX1001 at 6:23-27; *see also id.* at 5:66-6:7; EX2006 at ¶ 48. Network isolation via packet filtering (e.g., Delco’s packet filter 74) does not *separate the host system from the virtual system* because it does not restrict access to host operating system resources. EX2006 at ¶¶46-49, 53-56.

The distinction between network isolation (e.g., packet filtering) and separating the host/virtual systems is also apparent in the claims of the ’780 patent. As, Petitioner acknowledges, the ’780 patent describes three “distinct methods of isolation.” Pet. 8; EX1003 at ¶¶34-36. As recited in claim 1, for example, two of the claimed firewalls (the *host-based firewall* and the *network firewall*) are configured to implement **network isolation** and the third claimed firewall (the *internal firewall*) is configured to **separate the host system from the virtual system**. Based on the express language of the claims and the associated disclosures in the ’780 patent, a firewall configured for network isolation is not the same as a firewall configured to separate a host system from a virtual system. EX2006 at ¶¶53-56. Delco’s packet filter 74 is configured

for network isolation and does not operate as *an internal firewall [that] is configured to separate the host system from the virtual system. Id.*

Petitioner makes two assertions as to how Delco's packet filter 74 is *configured to separate the host system from the virtual system*. Neither is supported. **First**, Petitioner contends that Delco's packet filter 74 "filters packets between the virtual machine and the host system" and that filtering packets is the "function of a firewall." Pet. 39. Thus, Petitioner implies that a component that filters packets is a firewall. But the '780 patent does not recite an *internal firewall* configured to filter packets. Rather, as explained above, packet filtering (network isolation) is recited for two separate firewalls recited in claim 1, but not for the *internal firewall*, which is instead configured to *separate the host system from the virtual system*. In addition, Petitioner fails to support its implicit construction that the claimed *internal firewall* is configured to filter packets. For example, Petitioner cites to no disclosure in the '780 specification supporting its contention that packet filtering is a function of the claimed *internal firewall. Id.* Instead, Petitioner cites to Delco's description of packet filtering of network traffic (Pet. 39 at n. 4) but does not explain how these disclosures in Delco are relevant to an *internal*

firewall [that] is configured to separate the host system from the virtual system.

Second, Petitioner asserts that Delco's packet filter 74 is *configured to separate the host system from the virtual system* because it is "placed between the host operating system 42 and the guest operating systems 58." Pet. 40. Here, Petitioner suggests that a device, such as Delco's packet filter 74, is *configured to separate* the host/guest operating systems merely because it is located "between" them. But this ignores the disclosures in the '780 patent about how the internal firewall operates:

The guest is separated and completely isolated by an internal firewall from the host, and the guest cannot access any of the resources of the host computer, except that the guest can initiate cut, copy and paste operations..., and the guest can also request print operations. The host can transfer files to and from virtual data storage area accessible by the guest by manual operator action. No other interaction is permitted.

EX1001 at 3:42-49; *see also id.* at 8:20-35, 12:46-52. Thus, the '780 patent describes an internal firewall configured to limit access to host resources and limit operations initiated by the guest system. In contrast, Petitioner identifies no disclosure in Delco even suggesting that packet filter 74

limits access to resources of the host operating system. EX2006 at ¶¶ 51-56.

For these reasons, Petitioner’s attempts to map Delco’s packet filter 74 to the claimed *internal firewall [that] is configured to separate the host system from the virtual system* do not have a reasonable likelihood of success on the merits. Its challenges to claims 1 and 11 in Grounds 1 and 2 fail. Because each challenged dependent claim depends from one of independent claims 1 or 11, each of Petitioner’s challenges to those claims fail as well.

V. THE FINTIV FACTORS WEIGHT AGAINST INSTITUTION

35 U.S.C. § 314(a) gives the Board discretion to deny institution of the requested *inter partes* review due to the advanced state of parallel district court litigation regarding the same issues. *See NHK Spring Co. v. Intri-Plex Techs., Inc.*, IPR2018-00752, Paper 8 (PTAB Sept. 12, 2018) (precedential, designated May 7, 2019) (“*NHK Spring*”). The Board has set forth six factors for determining whether discretionary denial due to such parallel litigation is appropriate (the “*Fintiv* factors”):

whether the court granted a stay or evidence exists that one may be granted if a proceeding is instituted;

proximity of the court's trial date to the Board's projected statutory deadline for a final written decision;

investment in the parallel proceeding by the court and the parties;

overlap between issues raised in the petition and in the parallel proceeding;

whether the petitioner and the defendant in the parallel proceeding are the same party; and

other circumstances that impact the Board's exercise of discretion, including the merits.

Apple Inc. v. Fintiv, Inc., IPR2020-00019, Paper 11 at 5-6 (PTAB Mar. 20, 2020) (precedential, designated May 5, 2020) (“*Fintiv I*”); *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 15 at 7-8 (PTAB May 13, 2020) (decision denying institution of *inter partes* review) (“*Fintiv II*”). “These factors relate to whether efficiency, fairness, and the merits support the exercise of authority to deny institution in view of an earlier trial date in the parallel proceeding.” *Fintiv I* at 6. In evaluating the factors, “the Board takes a holistic view of whether efficiency and integrity of the system are best served by denying or instituting review.” *Id.*

As set forth below, all of the *Fintiv* factors weigh against institution. To avoid duplication of efforts, wasting resources, and potentially inconsistent decisions, the Board should deny institution.

A. Factor 1: The district court has not granted a stay, nor is there any evidence that a stay will be granted.

There is presently one active consolidated district court case involving the '780 patent pending in the Eastern District of Texas: *Croga Innovations Limited v. Cisco Systems, Inc.*, No. 2:24-cv-00065-JRG (Lead Case).

This case was consolidated with Member Cases *Croga Innovations Limited v. Fortinet, Inc.*, No. 2:24-cv-00206-JRG (E.D. Tex.) and *Croga Innovations Limited v. Palo Alto Networks, Inc.*, No. 2:24-cv-00208-JRG (E.D. Tex.). See EX2004, Amended Docket Control Order, *Croga Innovations Limited v. Cisco Systems, Inc.*, No. 2:24-cv-00065-JRG, Dkt. 53 (E.D. Tex. July 18, 2024).

Jury selection is scheduled for October 20, 2025. See *Id.* This is “a deadline that cannot be changed without an acceptable showing of good cause. Good cause is not shown merely by indicating that the parties agree that the deadline should be changed.” *Id.* at 6.

The district court case is not at an early stage. The case against Cisco was filed on February 1, 2024 – which will be more than a year

before an institution decision is due in three months. *See* Ex. 1011, Complaint.

Fact discovery is ongoing. By the date the institution decision is due, the parties will have substantially completed claim construction discovery. *See* EX2004 at 5. A Final Written Decision will not be due until four (4) months *after* trial is scheduled to begin with jury selection on October 20, 2025. *See Id.* at 1.

This has been an actively litigated matter with 64 docket entries to date. *See* EX2001, Docket Sheet, *Croga Innovations Limited v. Cisco Systems, Inc.*, No. 2:24-cv-00065-JRG (E.D. Tex. November 20, 2024). Nevertheless, and notwithstanding the number of defendants in this consolidated case, no party has filed a motion for a stay.

And it is unlikely that a stay would be granted in the district court. *Trover Group, Inc. v. Dedicated Micros USA*, No. 2:13-cv-1047-WCB, 2015 WL 1069179, at *6 (E.D. Tex. Mar. 11, 2015) (Bryson, J.) (“This Court’s survey of cases from the Eastern District of Texas shows that when the PTAB has not yet acted on a petition for *inter partes* review, the courts have uniformly denied motions for a stay.”); *see also Samsung Elecs. Co. Ltd. v. Evolved Wireless LLC*, IPR2021-00950, Paper 10 at 10-

11 (PTAB Nov. 29, 2021) (“*Evolved*”) (finding this factor weighed in favor of denial and denying institution where patent owner showed a stay was unlikely based on the advanced stage of the case and the court’s past decisions denying stays); *Samsung Elecs. Co. Ltd. v. Clear Imaging Research, LLC*, IPR2020-0152, Paper 12 at 12-13 (PTAB Mar. 3, 2021) (denying institution because, in part, Judge Gilstrap deemed unlikely to stay a case in similar circumstances).

The Eastern District of Texas is likely to find that a stay in this situation would unduly prejudice Patent Owner, disfavoring a stay. *See, e.g.,* EX2002, Order, *MyPort, Inc. v. Samsung Electronics Co., Ltd., et al.*, No. 2:22-cv-00114-JRG (E.D. Tex. June 12, 2023) at 4 (Noting that patent owner has an interest in the timely enforcement of its patent rights and that granting a stay could delay the case by nearly two years where the PTAB decision is not due until over two months after jury trial is set to begin.). The district court is also likely to find that the stage of litigation disfavors a stay. As noted above, by the date an institution decision is due in this proceeding, the parties will have substantially completed claim construction discovery in the district court litigation and, as further evidenced by the docket sheet, a substantial amount of work and

financial resources have been invested in the district court case. Under similar circumstances, the district court has found that the stage of litigation disfavors a stay. *Id.* at 5.

Moreover, because Cisco has asserted multiple invalidity theories and there are other defendants who are asserting invalidity defenses, a stay in the district court would be unlikely to simplify the issues. *See, e.g.,* EX2003, Defendants’ Invalidity Contentions, *Croga Innovations Limited v. Cisco Systems, Inc.*, No. 2:24-cv-00065-JRG (Lead Case) (E.D. Tex. August 5, 2024). As the district court recently noted, when a party has raised multiple invalidity theories that will not go before the PTAB, a stay would leave in limbo these invalidity theories that will not go before the Board, weighing against a stay. EX2002, *MyPort* at 6-7.

As explained by the Board, a stay of the district court litigation pending resolution of the PTAB proceedings “allays concerns about inefficiency and duplication of efforts.” *Fintiv I* at 6; *Fintiv II* at 12. But here, the district court has not stayed the pending litigation, nor is there any evidence that a stay will be granted. Allowing this IPR to proceed simultaneously with the district court litigation would be wasteful and inefficient. This factor weighs against institution.

B. Factor 2: The proximity of the court’s trial date to the Board’s projected statutory deadline for a final written decision.

The statutory deadline for a final written decision in this proceeding is February 20, 2026, which can be extended to August 20, 2026, for good cause or in the case of joinder. 37 C.F.R. § 42.100.

Jury selection in the district court is scheduled for October 20, 2025. *See* EX2004 at 1. This is “a deadline that cannot be changed without an acceptable showing of good cause. Good cause is not shown merely by indicating that the parties agree that the deadline should be changed.” *Id.* at 6.

Even if the Board disregards the scheduled trial date, an analysis of the current median time-to-trial statistics still weighs against institution. *See* EX2005, U.S. District Courts—Federal Court Management Statistics—Profiles—During the 12-Month Periods Ending June 30, 2019 through 2024. The most recent statistics, for a 12-month period ending June 30, 2024, show a median time-to-trial in the Eastern District of Texas of 21.6 months. *Id.* at 35. Accordingly, the projected trial date for purposes of *Fintiv* in accordance with Director’s June 21, 2022 Memorandum on Discretionary Denials would be December 19,

2025 – close to the scheduled trial date and more than two (2) months before the expected timing of a Final Written Decision if proceedings are instituted. This 2-4 month gap between the trial date and the date of the final written is decision is significantly greater than the approximately one month difference that Petitioner asserts would neutralize factor two. *See e.g., Cisco Systems Inc., v. Video Solutions*, IPR2024-00194 (PTAB March 28, 2024).

This factor weighs against institution.

C. Factor 3: The parties and the courts have made a substantial investment in the parallel proceeding.

This factor relates to the “amount and type of work already completed in the parallel litigation by the court and the parties *at the time of the institution decision.*” *Fintiv I* at 9 (emphasis added). For example, “if, at the time of the institution decision, the district court has issued substantive orders related to the patent at issue in the petition,” this factor favors denial. *Id.* at 9-10. Claim construction orders entered by the district court likewise “indicate that the court and parties have invested sufficient time in the parallel proceeding to favor denial.” *Id.* at 10.

As discussed above, fact discovery is ongoing. By the date the institution decision is due, the parties will have substantially completed claim construction discovery. *See* EX2004 at 5. As shown in the district court docket sheet, the courts and the parties have made a substantial investment in the parallel proceeding. *See* EX2001 (Docket Sheet).

Thus, the parties and the district court will have invested significant time and resources in the litigation by the time the Board reaches an institution decision in this matter. This favors discretionary denial. *Fintiv I* at 10; *Fintiv II* at 13-14 (finding that “the level of investment and effort already expended on claim construction and invalidity contentions” favored denial).

D. Factor 4: There is complete overlap between this IPR and the district court proceedings.

This factor looks at “whether all or some of the claims challenged in the petition are also at issue in district court,” and whether the “petition includes the same or substantially the same claims, grounds, arguments, and evidence” as the parallel district court case. *Fintiv I* at 12-13.

Here, Petitioner has challenged all of the asserted claims of the ’780 patent. Petitioner’s Amended Preliminary Invalidity Contentions in the

district court case identify the same Delco reference asserted in the Petition as prior art that renders obvious the challenged claims in Grounds 1 and 2, which address all asserted claims of the '780 patent. See EX2003, Defendants' Invalidity Contentions, *Croga Innovations Limited v. Cisco Systems, Inc.*, No. 2:24-cv-00065-JRG (Lead Case) (E.D. Tex. August 6, 2024), at 2, 9, 40-42.

Thus, with respect to the asserted claims of the '780 patent, there is overlap with respect to Petitioner's invalidity arguments and evidence. That the district court case involves additional prior art references not asserted in this IPR is "not relevant to the question of the degree of overlap for this factor." *Fintiv II* at 15. The fact that the Petition challenges additional claims does not warrant institution. See, e.g., *Next Caller Inc. v. TRUSTID, Inc.*, IPR2019- 00961, Paper 10 at 14 (PTAB Oct. 16, 2019) (denying institution where the district court case involved only a subset of the challenged claims).

Notably, Petitioner has not stipulated to not pursue in a parallel district court proceeding the same grounds as in the petition or any grounds that could have reasonably been raised in the petition (*i.e.*, a *Sotera* stipulation). Had Petitioner done so, that could mitigate concerns

of potentially conflicting decisions and duplicative efforts between the district court and the PTAB. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (precedential as to § II.A). Those concerns are particularly relevant when, as here, the Petitioner is asserting the same prior art in the district court and the PTAB, guaranteeing duplicative efforts between the district court and the PTAB and potentially conflicting decisions. These concerns are not alleviated by the weak non-*Sotera* stipulation discussed in the petition. *See Samsung Electronics Co. Ltd. et al. v. Staton Techiya, LLC*, IPR2022-00302, Paper 13, at 16-17 (PTAB July 11, 2022) (“The breadth of such a stipulation affects the weight it is given in the discretionary denial analysis.”).

In sum, this IPR and the district court case involve the same claims—which will be construed under the same *Phillips* standard—and the same prior art (and, as discussed below, the same parties), which raises substantial “concerns of inefficiency and the possibility of conflicting decisions.” *Fintiv I* at 12. This factor thus weighs in favor of a discretionary denial. *See Fintiv II* at 15; *NHK Spring* at 19–20.

E. Factor 5: Petitioner is a defendant in the district court litigation.

There is no dispute that Petitioner is the defendant in the district court litigation. “Because the petitioner and the defendant in the parallel proceeding are the same party, this factor weighs in favor of discretionary denial.” *Fintiv II* at 15.

F. Factor 6: Other circumstances that impact the Board’s exercise of discretion, including the merits.

The Board may consider other circumstances in the exercise of its discretion, including the merits of the case. *Fintiv I* at 14. However, “a full analysis of the merits is not necessary to evaluate this factor.” *Fintiv II* at 17. The compelling merits standard is a higher standard than the standard for institution set by statute. “A challenge can only ‘plainly lead to a conclusion that one or more claims are unpatentable’ if it is highly likely that the petitioner would prevail with respect to at least one challenged claim.” *OpenSky Indus., LLC v. VLSI Tech. LLC*, IPR2021-01064, Paper 102, 49 (PTAB Oct. 4, 2022) (precedential). Petitioner has not done so here, and, in light of the serious flaws discussed above in § IV, this factor also favors discretionary denial.

Petitioner’s argument that it has presented a “compelling” case on the merits does not withstand scrutiny. The argument turns on Petitioner’s assertion that Delco discloses the same “three distinct methods of isolation” claimed in the ’780 patent. However, as explained in § IV, Delco does not disclose an internal firewall *configured to separate the host system from the virtual system*.

The Petition does not present a reasonable likelihood of invalidity under any ground or challenged claim, let alone compelling evidence of unpatentability, and factor 6 weighs against institution. All six *Fintiv* factors strongly favor discretionary denial, and the Petition should be denied.

Date: November 20, 2024

Respectfully submitted,

/Brett Cooper/

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Lead counsel for Patent Owner

CERTIFICATION REGARDING WORD COUNT

The undersigned hereby certifies that the word count in this Patent Owner Preliminary Response is 4,235 words, as counted by the word-processing program Microsoft Word that was used to generate this Patent Owner Preliminary Response, where such word count excludes the table of contents, table of authorities, mandatory notices, certificate of service, appendix of exhibits, claim listing, and this certificate of word count. This Patent Owner Preliminary Response is in compliance with the 14,000-word limit set forth in 37 C.F.R. § 42.24(b)(1).

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

The undersigned hereby certifies that the above document was served on November 20, 2024, 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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