

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

2985, LLC d/b/a MOUNTAIN VOYAGE COMPANY, LLC,
Petitioner,

v.

THE RIDGE WALLET LLC,
Patent Owner.

Case IPR2024-01264
Patent 10,791,808

**PETITIONER'S MOTION FOR JOINDER
UNDER 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22, and 42.122(b)**

Table of Contents

I.	STATEMENT OF RELIEF REQUESTED	1
II.	STATEMENT OF MATERIAL FACTS.....	2
III.	STATEMENT OF REASONS FOR REQUESTED RELIEF	3
	A. Legal Standards	3
	B. Mountain Voyage’s Motion for Joinder Is Timely.....	4
	C. Every Factor Weighs in Favor of Joinder	5
	1. Joinder is Appropriate with the Shenzhen IPR.....	6
	2. No New Grounds of Unpatentability in the Instant Petition	7
	3. No Impact on the Schedule for the Shenzhen IPR.....	7
	4. Briefing and Discovery Will Be Simplified	8
IV.	GENERAL PLATIC FAVORS INSTITUTION.....	10
	A. First, Second, and Third <i>General Plastic</i> Factors.....	11
	B. Fourth and Fifth <i>General Plastic</i> Factors.....	12
	C. Sixth and Seven <i>General Plastic</i> Factors.....	13
V.	CONCLUSION.....	15

Table of Authorities

Cases

<i>2985 LLC, d/b/a Mountain Voyage Company LLC v. The Ridge Wallet LLC,</i> IPR2024-00692 (PTAB Mar. 15, 2024).....	1
<i>2985 LLC, d/b/a Mountain Voyage Company LLC v. The Ridge Wallet LLC,</i> IPR2024-01264 (PTAB August 5, 2024).....	1
<i>Apple Inc. v. Uniloc2017 LLC</i> , IPR2020-00854, Paper 9 (PTAB October 28, 2020) (precedential).....	11
<i>Code200, UAB v. Bright Data Ltd.</i> , IPR2022-00861, Paper 18 at 5 (PTAB Aug. 23, 2022) (precedential).....	11, 14
<i>Corp. v. Memory Integrity, LLC.</i> , IPR2015-01353, Paper 11 at 7 (PTAB Oct. 5, 2015)	10
<i>Enzymotec Ltd. v. Neptune Techs & Bioresources, Inc.</i> , IPR2014-00556, Paper 19 at 6 (PTAB July 9, 2014).....	5
<i>General Plastic Industrial Co. Ltd. v. Canon Kabushiki Kaisha</i> , IPR2016-01357, Paper 19 at 9-10 (PTAB Sep. 6, 2017).....	11
IPR2014-00782.....	3
<i>Kinston Tech. Co. v. Securewave Storage Solutions, Inc.</i> , IPR2020-00139, Paper 12 at 6-7 (PTAB Mar. 23, 2020)	4
<i>Kyocera Corporation v. Softview LLC</i> , IPR2013-00004, Paper 15 at 4 (April 24, 2013).....	3

<i>Noven Pharm., Inc. v. Novartis AG</i> , IPR2014-00550, Paper 38 at 5 (PTAB April 10, 2015).....	9
<i>Oracle America Inc. v. Realtime Data LLC</i> , IPR2016-01672, Paper 13 at 7 (PTAB Mar. 7, 2017)	5
<i>Ridge Wallet LLC, The v. Mountain Voyage Company LLC</i> , No. 1:23-cv-00407-CNS-SP (D.C. Colo).....	1, 2
<i>Samsung Elecs. Co., Ltd. v. Raytheon Co.</i> , IPR2016-00962, Paper 12 at 9 (PTAB Aug. 24, 2016)	5
<i>Shenzhen Pincan Technology Co., Ltd</i> , IPR2024-00340	passim
<i>Taiwan Semiconductor Mfg. Co., Ltd. v. Zond LLC</i> , IPR2014- 00781	3
<i>The Ridge Wallet LLC v. Shenzhen Pican Technology Co., Ltd. d/b/a ARW-Wallet</i> , No. 2:23-cv-00392 (E.D. Tex.)	2
<i>T-Mobile USA, Inc., v. VOIP-Pal.com, Inc.</i> , IPR2023-00641, Paper 11 at 8-9 (PTAB Jul. 28, 2023)	12, 13

Statutes

35 U.S.C. § 315(c)	1, 3
35 U.S.C. § 316(a)(11)	8

Other Authorities

157 CONG. REC. S1376.....	4
Patent Trial and Appeal Board Consolidated Trial Practice Guide (Nov. 2019), 76-78	

.....	4
-------	---

Rules

37 C.F.R. § 42.100(c)	8
37 C.F.R. § 42.122(b)	1, 3, 4
37 C.F.R. §§ 42.22	1

I. STATEMENT OF RELIEF REQUESTED

2985 LLC d/b/a Mountain Voyage Co. (“Mountain Voyage” or “Petitioner”) respectfully submits this Motion for Joinder, concurrently with a Petition (the “Instant Petition”) for *inter partes* review of U.S. Patent No. 10,791,808 (“the ’808 Patent”). *See 2985 LLC, d/b/a Mountain Voyage Company LLC v. The Ridge Wallet LLC*, IPR2024-01264 (PTAB August 5, 2024).

Pursuant to 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22, and 42.122(b), Mountain Voyage requests *inter partes* review and joinder with *Shenzhen Pincan Technology Co., Ltd*, IPR2024-00340 (“the Shenzhen IPR”), which was filed on January 2, 2024. The Instant Petition is substantively identical to the petition in the Shenzhen IPR, challenging the same claims of the ’808 Patent on the same grounds while relying on the same prior art, arguments, and evidence. This Motion for Joinder and the accompanying Instant Petition are timely being filed within one month of the decision to institute trial in the Shenzhen IPR.

Mountain Voyage is currently being sued by Patent Owner for alleged infringement of the ’808 patent in the District Court of Colorado. *See Ridge Wallet LLC, The v. Mountain Voyage Company LLC*, No. 1:23-cv-00407-CNS-SP (D.C. Colo) (the “Parallel Litigation”). Mountain Voyage has another petition before the PTAB challenging the validity of the ’808 Patent. *See 2985 LLC, d/b/a Mountain Voyage Company LLC v. The Ridge Wallet LLC*, IPR2024-00692 (PTAB Mar. 15,

2024) (“the ’692 Petition”).

Joinder is appropriate here because (i) the Instant Petition is substantively identical to the petition in the Shenzhen IPR, (ii) Mountain Voyage agrees to an “understudy role,” and (iii) Mountain Voyage relies upon the same expert declaration as relied upon in the Shenzhen IPR, simplifying briefing and discovery. Accordingly, joinder will provide for a just, speedy, and inexpensive determination of related proceedings.

Therefore, Mountain Voyage respectfully requests that the Board grant this Motion for Joinder.

II. STATEMENT OF MATERIAL FACTS

1. The owner of the ’808 patent, Ridge Wallet LLC (“Ridge”), sued Mountain Voyage alleging infringement of the ’808 Patent in the United States District Court of Colorado. Mountain Voyage was served with Ridge’s complaint on March 15, 2023. *See Ridge Wallet LLC, The v. Mountain Voyage Company LLC*, No. 1:23-cv-00407-CNS-SP, ECF No. 15 (D.C. Colo).

2. Ridge also sued Shenzhen Pincan Technology Co., Ltd, (“Shenzhen”) alleging infringement of the ’808 Patent in the United States District Court of the Eastern District of Texas. *See The Ridge Wallet LLC v. Shenzhen Pican Technology Co., Ltd. d/b/a ARW-Wallet*, No. 2:23-cv-00392 (E.D. Tex.). Shenzhen waived service of the complaint on August 29, 2023. *Id.* at ECF No. 6.

3. On January 2, 2024, Shenzhen timely filed a Petition for *inter partes* review challenging claims 1-24 of the '808 Patent. *See Shenzhen Pincan Technology Co., Ltd v. Ridge Wallet, LLC*, IPR2024-00340, Paper 1 at 1 (PTAB January 2, 2024).

4. Mountain Voyage's Petition and this Motion for Joinder are being filed within one month from the decision to institute for trial the Shenzhen IPR. *Id.*, Paper 18 (PTAB July 26, 2024).

III. STATEMENT OF REASONS FOR REQUESTED RELIEF

A. Legal Standards

A petitioner may request joinder, without prior authorization, up to one month after the institution date of the proceeding to which joinder is requested. *See* 37 C.F.R. § 42.122(b); *Taiwan Semiconductor Mfg. Co., Ltd. v. Zond LLC*, IPR2014- 00781 and IPR2014-00782, Paper 5 at 3 (PTAB May 29, 2014).

The Board may grant a motion seeking to join a petitioner for *inter partes* review to another *inter partes* review proceeding. *See* 35 U.S.C. § 315(c). In deciding whether to exercise its discretion and permit joinder, the Board considers several factors, including: (1) the reasons why joinder is appropriate; (2) whether the new petition presents any new grounds of unpatentability; (3) what impact, if any, joinder would have on the trial schedule for the existing review, and (4) how briefing and discovery may be simplified. *See Kyocera Corporation v. Softview LLC*,

IPR2013-00004, Paper 15 at 4 (April 24, 2013); Patent Trial and Appeal Board Consolidated Trial Practice Guide (Nov. 2019), 76-78.

Further, the legislative history of the AIA suggests that joinder may be granted as a matter of right where the later petitioner files an identical petition with identical grounds of unpatentability. *See* 157 CONG. REC. S1376 (daily ed. Mar. 8, 2011) (statement of Sen. Kyl) (“The Office anticipates that joinder will be allowed *as of right*-if an *inter partes* review is instituted on the basis of a petition, for example, a party that files an identical petition will be joined to that proceeding, and thus allowed to file its own briefs and make its own arguments.”) (emphasis added).

B. Mountain Voyage’s Motion for Joinder Is Timely

A motion for joinder is timely if the moving party files within one month of institution of the *inter partes* review for which joinder is requested. 37 C.F.R. § 42.122(b). Because Mountain Voyage files this Motion within one month of institution of the Shenzhen IPR, this Motion is timely. *Id.*; *see e.g., Kinston Tech. Co. v. Securewave Storage Solutions, Inc.*, IPR2020-00139, Paper 12 at 6-7 (PTAB Mar. 23, 2020) (holding that “me-too” petition was timely where it was filed more than one year after petitioner was sued for infringement but within one month of the institution of the IPR which petitioner sought to join). Additionally, this Motion is being filed before any motions have been filed requesting termination of the Shenzhen IPR.

C. Every Factor Weighs in Favor of Joinder

All four factors considered by the Board weigh in favor of granting Mountain Voyage’s Motion for Joinder. Specifically, the Instant Petition does “not present issues that might complicate or delay” the Shenzhen IPR. *See Enzymotec Ltd. v. Neptune Techs & Bioresources, Inc.*, IPR2014-00556, Paper 19 at 6 (PTAB July 9, 2014) (“we are mindful of a policy preference for joining a party that does not present new issues that might complicate or delay an existing proceeding”). In fact, because the Instant Petition is substantively identical to the petition in the Shenzhen IPR, joinder would secure the just, speedy, and inexpensive resolution of the related proceedings. *See, e.g., Oracle America Inc. v. Realtime Data LLC*, IPR2016-01672, Paper 13 at 7 (PTAB Mar. 7, 2017) (noting that “joining Oracle’s identical challenges to those in the 1002 IPR will lead to greater efficiency while reducing the resources necessary from both Realtime and the Board.”).

Joinder would have little, if any, impact on the Shenzhen IPR because, as detailed below, no new grounds would be added, the schedule would not be affected, no additional briefing or discovery would be required, and no additional burdens would be placed on Patent Owner. The Board “routinely grants motions for joinder where the party seeking joinder introduces identical arguments and the same grounds raised in the existing proceeding.” *Samsung Elecs. Co., Ltd. v. Raytheon Co.*, IPR2016-00962, Paper 12 at 9 (PTAB Aug. 24, 2016) (internal quotations and

citations omitted).

Further, if Shenzhen moves to terminate the Shenzhen IPR and is dismissed before the Board decides this Motion for Joinder, Mountain Voyage respectfully requests that the Board exercise its discretion and decline to terminate the Shenzhen IPR at least until the Board considers this Motion.

Accordingly, joinder is appropriate because it eliminates the possibility of duplicate efforts and ensures a just, speedy, and inexpensive resolution of these related proceedings.

1. Joinder is Appropriate with the Shenzhen IPR

Joinder with the Shenzhen IPR is appropriate because the Instant Petition involves the same patent, challenges the same claims, relies on the same testimony from the same expert, and is based on the same grounds and combinations of prior art submitted in the Shenzhen IPR. The Instant Petition is substantively identical to the Shenzhen IPR, containing only minor differences unrelated to the merits of the proposed grounds.¹ There are no changes to the facts, citations, evidence, or

¹ The Instant Petition is a near word-for-word copy of the Shenzhen IPR. The only changes made were to account different parties, update to the mandatory notices, reflect claim construction in the Parallel Litigation, and add the claim construction order in the Parallel Litigation as Exhibit 1020.

arguments presented in the Instant Petition in relation to the grounds of the Shenzhen IPR. Because these proceedings are substantively identical, good cause exists for joining this proceeding with the Shenzhen IPR so that the Board can efficiently resolve all grounds in both the Instant Petition and the Shenzhen IPR in a single proceeding.

2. No New Grounds of Unpatentability in the Instant Petition

The Instant Petition challenges the same claims, under the same grounds, while relying on the same arguments, expert declaration, and evidence. Accordingly, no new claims and no new grounds will be added to the Shenzhen IPR as a result of the Board allowing joinder.

3. No Impact on the Schedule for the Shenzhen IPR

Because the Instant Petition challenges no additional claims and raises no new grounds of unpatentability, joinder should have no impact on any trial schedule issued in the Shenzhen IPR. Further, Mountain Voyage will adhere to all applicable deadlines set forth in any Shenzhen IPR Scheduling Order and will coordinate with Shenzhen's counsel to consolidate filings. Additionally, no additional expert discovery will be needed as the Instant Petition relies upon the same declaration testimony from the same expert, Dr. Kimberly Cameron, as relied upon by the petition in the Shenzhen IPR.

Additionally, if joined, Mountain Voyage will not file additional briefs

outside of the consolidated filings, will not request any additional deposition time, and will not request any additional oral hearing time.² In the event the Shenzhen IPR is terminated with respect to the Shenzhen petitioners, Mountain Voyage intends to “step into the shoes” of the dismissed Shenzhen petitioners and materially participate in the joined proceedings.

Accordingly, for the reasons above, joinder of Mountain Voyage to the Shenzhen IPR will not affect the Board’s ability to complete its review and issue a final decision within the statutory time limits under 35 U.S.C. § 316(a)(11) and 37 C.F.R. § 42.100(c).

4. Briefing and Discovery Will Be Simplified

Mountain Voyage explicitly agrees to take an “understudy” role³, described by the Board in other proceedings as follows:

(a) Mountain Voyage shall not make any substantive filing and shall be bound by the Shenzhen Petitioners, unless a filing concerns termination and

² While Mountain Voyage will not materially participate in calls with the Board, depositions, and any oral hearings, Mountain Voyage anticipates that its counsel may attend such events.

³ Additionally, Mountain Voyage’s role does not foreclose communication between Mountain Voyage and the petitioners in the Shenzhen IPR.

settlement, or issues solely involving Mountain Voyage.

(b) Mountain Voyage shall not present any argument or make any presentation at oral hearing unless an issue solely involves Mountain Voyage, or when addressing Board-approved motions that do not affect the Shenzhen Petitioners, or their respective position;

(c) Mountain Voyage shall not seek to cross-examine or defend the cross examination of any witness, unless the topic of cross-examination concerns issues solely involving Mountain Voyage;

(d) Mountain Voyage shall not seek discovery from Patent Owner on issues not solely involving Mountain Voyage;

(e) Mountain Voyage will not rely on expert testimony beyond that submitted by the Shenzhen Petitioners unless the Shenzhen Petitioners are terminated from the case prior to any necessary depositions. If the Shenzhen Petitioners are not terminated from the case prior to any necessary depositions, Mountain Voyage agrees to rely entirely on, and be bound by, the expert declarations and depositions in the Shenzhen IPR. *See, e.g., Noven Pharm., Inc. v. Novartis AG*, IPR2014-00550, Paper 38 at 5 (PTAB April 10, 2015).

Unless and until the Shenzhen petitioners cease to participate in the Shenzhen IPR proceeding, Mountain Voyage will not assume an active role. Mountain Voyage will assume the primary role only if Shenzhen ceases to participate in the Shenzhen

IPR and the Shenzhen IPR terminates.

Accordingly, Patent Owner and the Shenzhen Petitioners will only need to respond to one principal set of papers, will not require additional time to address additional arguments, and can thus proceed with the existing trial schedule. These steps will minimize or eliminate any potential complications or delay that could potentially result from joinder. *See Sony Corp. v. Memory Integrity, LLC.*, IPR2015-01353, Paper 11 at 7 (PTAB Oct. 5, 2015) (granting motion because “joinder would increase efficiency by eliminating duplicative filings and discovery and would reduce costs and burdens on the parties as well as the Board” where second petitioner agreed to “understudy” role). Mountain Voyage will also abide by any additional conditions the Board deems appropriate for an “understudy” role.

By accepting an “understudy” role, Mountain Voyage can comply with any schedule in the Shenzhen IPR and avoid any duplication of effort by the Board or the Patent Owner. These steps will minimize any potential complications or delay that potentially may have resulted by joinder.

IV. GENERAL PLATIC FAVORS INSTITUTION

The Board’s decision in *General Plastics* articulates a non-exhaustive list of factors to be considered when evaluating whether to exercise discretion under 35 U.S.C. § 314(a) in relation to joinder petitions. *See General Plastic Industrial Co. Ltd. v. Canon Kabushiki Kaisha*, IPR2016-01357, Paper 19 at 9-10 (PTAB Sep. 6,

2017); *Apple Inc. v. Uniloc2017 LLC*, IPR2020-00854, Paper 9 (PTAB October 28, 2020) (precedential).

Unlike other motions for joinder where the Board exercised its discretionary denial under 35 U.S.C. § 314(a) based on the *General Plastic* factors, the Instant Petition would not prejudice the Patent Owner. Notably, Mountain Voyage's previous petition, the '692 Petition, was filed just three months after the Shenzhen IPR, which the Instant Petition seeks to join. Thereby, the Shenzhen IPR presented the same prior art and arguments of the Instant Petition to the Patent Owner before the '692 Petition. Further, both petitions, the Shenzhen IPR and the '692 Petition, were filed without any guidance from Board or Patent Owner. Thus, in none of the petitions against the '808 Patent, including the Instant Petition, has there been an opportunity for petitioner to use prior decisions as a roadmap to remedy a deficient challenge.

A. First, Second, and Third *General Plastic* Factors

Director Vidal has articulated that “*General Plastic* factor 1 must be read in conjunction with factors 2 and 3. Where the first-filed petition under factor 1 was discretionarily denied or otherwise was not evaluated on the merits, factors 1-3 only weigh in favor of discretionary denial when there are “road-mapping” concerns under factor 3 or other concerns under factor 2.” *Code200, UAB v. Bright Data Ltd.*, IPR2022-00861, Paper 18 at 5 (PTAB Aug. 23, 2022) (precedential). Further,

“‘road-mapping’ concerns are minimized when, as in this case, a petitioner files a later petition that raises unpatentability challenges substantially overlapping with those in the previously-filed petition and the later petition is not refined based on lessons learned from later developments.” *Id.* at 5.

Since the Instant Petition is a “me too” joinder of a petition filed before the ’692 Petition, factor 2 is of little relevance as the Patent Owner would be no more or less burdened had the Instant Petition been filed before the ’692 Petition. Additionally, the ’692 Petition has yet to be evaluated on the merits. Further, the Instant Petition is substantially the same as the Shenzhen IPR, and Mountain Voyage would be adopting an “understudy” role. Moreover, the Shenzhen IPR was the first IPR asserted against the ’808 Patent. As such, the Instant Petition does not benefit from any guidance from the Board or Patent Owner. Thus, *General Plastic* factors 1-2 have little relevance, and *General Plastic* factor 3 weighs against discretionary denial. *See T-Mobile USA, Inc., v. VOIP-Pal.com, Inc.*, IPR2023-00641, Paper 11 at 8-9 (PTAB Jul. 28, 2023) (“any guidance provided by Patent Owner or the Board could not have influenced the content of the Petitions at issue in this proceeding. For this reason, we determine that the third *General Plastic* factor weighs against discretionarily denying institution.”)

B. Fourth and Fifth *General Plastic* Factors

Factor 4 has little relevance here due to at least the substantial overlap between

the Instant Petition and the Shenzhen IPR. *See* IPR2022-00861, Paper 17 at 14 (PTAB Jul. 25, 2022) (“because the asserted prior art is the same as the earlier-asserted art, we see no prejudice to Patent Owner due to the timing of the Petition.”) Regarding the fifth *General Plastic* factor, Mountain Voyage filed the Instant Petition and this Motion without delay, well within the statutory one month deadline. As such the fifth *General Plastic* factor weighs against discretionary denial. *See Id.*, IPR2023-00641, Paper 11 at 11 (“Once the Petitioner... decided to file the ‘me too’ Petitions at issue here, we discern no meaningful delay because a one-month window for filing a non-bared petition opened for Petitioner... Under factor 5, Petitioner need not explain why it used the entire one-month time period set by our Rules to file the Petitions and Motions. For these reasons we determine this fifth *General Plastic* factor weighs against denying institution.”)

C. Sixth and Seven *General Plastic* Factors

Allowing Petitioner’s joinder in an understudy role will not impact the Board’s resources beyond those resources the Board dedications to the instant Motion for Joinder. Shenzhen has not settled with the Patent Owner nor terminated the Shenzhen IPR. As discussed above, joinder of the Instant Petition would not add grounds of unpatentability, impact the schedule for the Shenzhen IPR, nor

complicate discovery.⁴ Thus, the sixth *General Plastic* factor neither favors nor disfavors institution.

Mountain Voyage agrees, as noted above, to comply with the set schedule for the Shenzhen IPR; thus, institution of the Instant Petition would not prejudice a final determination being made within 1 year after the date on which the Shenzhen IPR was instituted. Thus, the seventh *General Plastic* factor weighs against discretionary denial.

In sum, a holistic weighing of the *General Plastic* factors favors institution of the Instant Petition. *See* IPR2022-00861, Paper 18 at 6 (PTAB Aug. 23, 2022) (“Given that (1)... the Board did not substantively address the merits of the prior petition; (2) there is no evidence of ‘road-mapping’ related to factor 3 or other concerns of fairness related to factor 2; (3) factors 2, 4, and 5 were found to have limited relevance when it comes to a determination as to whether arguments should

⁴ In the unlikely event that (1) Mountain Voyage is required to adopt an active role in the Shenzhen IPR proceedings (*e.g.*, due to absence of the Shenzhen petitioners) and (2) trial is instituted for the ’692 Petition; Mountain Voyage is willing to provide a ranking between the petitions and provide information as to why the Board should exercise discretion to institute additional petitions. *See* The Board’s Consolidated Trial Practice Guide, November 2019, 59-60.

have been raised earlier and (4) I find factor 7 to have limited relevance and factor 6 to be outweighed by the Board's mission to improve patent quality... concerns of fairness are outweighed by the benefits to the patent system of improving patent quality by reviewing the merits of the challenges raised in the petitions....")

V. CONCLUSION

For the foregoing reasons, Mountain Voyage respectfully requests that the Board institute the Instant Petition upon the same grounds set forth in IPR2024-00340 and join the proceedings.

Dated: August 6, 2024

Respectfully Submitted,

/Jacob Busch/

Jacob M. Busch (Reg. No. 70,830)

Mountain Voyage Co.

2985 Xenon St.

Wheat Ridge, CO 80215

Tel: (330) 241-1800

jake@mountainvoyageco.com

Lead Counsel for Petitioner

Igor D. Ozeruga (Reg. No. 72,399)

Tarolli, Sundheim, Covell & Tummino

LLP

950 Main Ave Suite 710

Cleveland, OH 44113

Tel: (216) 452-6822

iozeruga@tarolli.com

Backup Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on counsel for Patent Owner a true and correct copy of the foregoing Petitioner's Motion for Joinder Under 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22, and 42.122(b) on August 5, 2024 by Federal Express Next Day Business Day Delivery to the Patent Owner by serving the address for Patent Owner's lead counsel, recorded on Patent Owner's Preliminary Response to the Shenzhen IPR:

Benjamin E. Weed
104 Main Street, Suite 2C
Park Ridge, Illinois 60068

Courtesy copies of the foregoing documents were served by email on the following counsel of record for the Patent Owner in both underlying litigations:

ben@ridge.com
gina@ridge.com
legal@ridge.com
caroline.vermillion@klgates.com
george.summerfield@klgates.com

Courtesy copies of the foregoing documents were also served by email upon the following counsel of record for Petitioner in IPR2024-00340.

xzhong@zhonglaws.com
iris.ju@glacier.law

Dated: August 6, 2024

Respectfully Submitted,

/Jacob Busch/

Jacob M. Busch (Reg. No. 70,830)
Lead Counsel for Petitioner