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April 30, 2025

VIA ELECTRONIC MAIL

Brett Cooper
BC LAW GROUP, P.C.
200 Madison Avenue, 24th Floor
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Re: *Lionra Technologies Limited v. Cisco Systems, Inc.*, Case No. 2:24-cv-97 (E.D. Tex.)

Dear Counsel,

I write again to request the immediate dismissal of this case, which, as we have previously indicated, is without merit. Should Lionra continue to press forward with these claims, Cisco will have no choice but to seek attorney's fees under 35 U.S.C. § 285, in light of the exceptional and unreasonable nature of this litigation.

We have consistently maintained that this matter is without merit from the outset, as outlined in my letter of July 23, 2024. In addition to this initial position, there are now several significant developments that make Lionra's continued prosecution of this case not only difficult to justify, but also increasingly untenable.

First, the Unified Patent Court has already ruled that Cisco does not infringe the EP equivalent patent, under claims nearly identical to those Lionra continues to pursue here. This ruling strongly suggests that the allegations at the heart of this case are without merit and do not support a viable claim for infringement. Continuing to advance this case in the face of such a decision is difficult to reconcile with any reasonable course of action.

Second, as of March 13, 2025, the Patent Trial and Appeal Board (PTAB) has instituted a review of all claims asserted by Lionra, finding sufficient grounds to proceed with a full examination of their validity. Given the significant likelihood of these claims being invalidated, it appears clear that they lack a legitimate basis for continued litigation.

Finally, Lionra's recent agreement to a claim construction requiring the concurrent writing of a plurality of headers effectively resolves the matter. Cisco's products, as evidenced by source code for the UADP, Silicon One, and LSE ASICs, do not write the headers concurrently in the manner described. This evidence was shared with Lionra, yet the case continues without a reasonable basis for doing so.

Given these developments, it is evident that the continued pursuit of this case is unreasonable. Cisco respectfully requests that this case be dismissed with prejudice. Should Lionra decline this request, Cisco will be compelled to seek attorney's fees under 35 U.S.C. § 285, recognizing the exceptional and unjustified nature of this litigation.

We trust you will give this matter the thoughtful consideration it warrants and take prompt action to bring this case to a conclusion.

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To the extent you disagree with any of the representations in this letter please explain in detail your beliefs, with supporting evidence.

Sincerely,

/s/ Brian Rosenthal

Brian Rosenthal