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Subject: IPR2024-01281 - Petitioner's reply statement regarding LBT IP
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To the Honorable Board:

As authorized by the Board during the oral argument in IPR2024-01281 on Wednesday, December 10, 2025, Petitioner Cisco Systems, Inc. provides the following 47-word reply to Patent Owner's statement regarding the Federal Circuit's decision in *LBT IP I LLC v. Apple, Inc.*, 2023 WL 3914920 (June 9, 2023) ("*LBT*"):

Unlike *LBT*, there is no missing limitation here. Limitation [13.3] is obvious over the prior art disclosures in combination, including Paatela's layer-specific header memories and Nelson's writing headers to multiple destinations in parallel. Lionra's argument about Paatela alone improperly attacks the references individually. MPEP 2145(IV); Ex.1027, 62:17-23.

Thank you,
Theo Foster
Lead Counsel for Petitioner Cisco Systems, Inc.

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