UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN ROOT TECHNOLOGY CO., LTD.,

Petitioner,

v.

CHIARO TECHNOLOGY LTD.,

Patent Owner.

Case: IPR2024-01296

U.S. Patent No. 11,413,380 B2

PATENT OWNER'S UPDATED MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(2)

Pursuant to 37 C.F.R. § 42.8(a)(2), Patent Owner provides Updated Mandatory Notices in the above-captioned *inter partes* review proceeding.

A. Real Party-In-Interest

In accordance with 37 C.F.R. § 42.8(b)(1), the real parties-in-interest are Willow Blossom Holdco Limited and Willow Innovations, Inc. (collectively "Willow"). Willow Blossom Holdco Limited is a wholly owned subsidiary of Willow Innovations, Inc. In March 2025, Willow acquired the patent at issue in this proceeding from prior patent owner, Chiaro Technology Limited, during the UK equivalent of a bankruptcy proceeding.

B. Notice of Lead and Backup Counsel

On May 5, 2025, the Board authorized Patent Owner to file a Motion for Withdrawal and Substitution of Counsel ("the Motion"). Patent Owner is filing the Motion and a Power of Attorney herewith appointing new lead and backup counsel. In accordance with 37 C.F.R. § 42.8(b)(3), Patent Owner's lead and backup counsel are:

Lead Counsel	Backup Counsel
Heath J. Briggs (Reg. No. 54,919) Greenberg Traurig, LLP 1144 15th St. Suite 3300 Denver, CO 80202 Telephone: 303-685-7418 Facsimile: 720-904-6118 BriggsH@gtlaw.com	Trenton Ward (Reg. No. 59,157) Greenberg Traurig, LLP Terminus 200 3333 Piedmont Road NE, Suite 2500 Atlanta, GA 30305 Telephone: 678-553-2100 Facsimile: 678-553-2212 Trenton.Ward@gtlaw.com

Backup Counsel	**Backup Counsel**
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Backup Counsel	**Backup Counsel**
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C. Service Information

In accordance with 37 C.F.R. § 42.8(b)(4), service on Patent Owner may be made by mail or hand delivery to: Greenberg Traurig, LLP, 1144 15th St., Suite 3300, Denver, CO, 80202. Patent Owner also consents to and prefers electronic service by emailing Willow-IPRs@gtlaw.com and counsel of record (shown above).

Dated: May 9, 2025

Respectfully submitted,

/s/ Heath J. Briggs

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§ 42.6(2) – CERTIFICATE OF SERVICE

In accordance with § 42.6(1), the undersigned certifies that on the 9th day of May 2025, the above **PATENT OWNER'S MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(2)** was served, via electronic mail upon the following counsel for Petitioner:

- Michael Hawkins – hawkins@fr.com
- Craig A. Deutsch – deutsch@fr.com
- Terry Stalford – stalford@fr.com
- Yong Peng – epeng@fr.com
- Ryan Chowdhury – rchowdhury@fr.com
- IPR58498-0003IP2@fr.com

Dated: May 9, 2025

Respectfully submitted,

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