UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENIUS SPORTS LTD.,

Petitioner

v.

SPORTSCASTR INC.,

(D/B/A PANDA INTERACTIVE),

Patent Owner.

IPR2024-01310

U.S. Patent No. 11,039,218

PETITIONER'S NOTICE OF INTENT TO DESIGNATE A PROVISIONALLY RECOGNIZED PTAB ATTORNEY AS BACK-UP COUNSEL

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[1] Unless otherwise specified, citations are to the original page, column, and line numbers in exhibits. Brackets ([]) are used to refer to the sequential page numbers added to exhibits pursuant to 37 C.F.R. §42.63(d)(2)(i).

Exhibit 1016	U.S. Patent Pub. No. 2014/0229992 ("Ellis")
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Exhibit 1021	Genius Sports' proposed *Sotera* Stipulation to SportsCastr
Exhibit 1022	James F. Kurose & Keith W. Ross, *Application Layer*, in Computer Networking a Top-Down Approach (Michael Hirsch et al. eds., 4th ed. 2012) ("Kurose")
Exhibit 1023	John Dilley et al., *Globally Distributed Content Delivery*, IEEE Internet Computing (Sept.–Oct. 2002).
Exhibit 1024	Mário Marques da Silva, Multimedia Communications and Networking (2012) ("Silva")
Exhibit 1025	*A Brief History of the Internet*, ONLINE LIB. LEARNING CENTER. (Feb. 9, 2024), https://www.usg.edu/galileo/skills/unit07/internet07_02.phtml ("Online Library")
Exhibit 1026	Hisayuuki Ohmata et al., *Hybridcast: A new media experience by integration of broadcasting and broadband*, 2013 ITU Kaleidoscope: Building Sustainable Communities, April 2013 ("Ohmata")
Exhibit 1027	Henning Schulzrinne et al., *RTP: A Transport Protocol for Real-Time-Applications*, DataTracker (January 1996), https://datatracker.ietf.org/doc/html/rfc1889 ("Schulzrinne")
Exhibit 1028	Brijesh Kumar, *Making Sense of Video Streaming Protocols*, LinkedIn. (Aug. 11, 2016), https://www.linkedin.com/pulse/making-sense-video-streaming-protocols-dr-brijesh-kumar/ ("Kumar")
Exhibit 1029	Ian Fette & Alexey Melnikov, *The WebSocket Protocol*, RFC Editor. (Dec. 2016), https://www.rfc-editor.org/rfc/rfc6455.html.

Exhibit 1030	Marcin Warczygłowa, *Real-time Web Application with Websockets and Vert.X* (Nov. 10, 2015), https://blog.allegro.tech/2015/11/real-time-web-application-with-websockets-and-vert-x.html.
Exhibit 1031	Randall Stewart & Chris Metz, *SCTP: new transport protocol for TCP/IP*, 5 IEEE 64, (2001) ("Stewart")
Exhibit 1032	Lydon Ong, John Yoakum &, *An Introduction to the Stream Control Transmission Protocol (SCTP)*, Datatracker. (May. 2002), https://datatracker.ietf.org/doc/rfc3286/ ("Ong")
Exhibit 1033	Jan Newmarch, *Introduction to Stream Control Transmission Protocol*, LINUX J. (Sep. 1, 2007), https://www.linuxjournal.com/article/9748 ("Newmarch")
Exhibit 1034	Kyung-Hoe Kim et al, *A transmission control SCTP for real-time multimedia streaming*, 54 Computer Networks 1418, (2010) ("Kim")
Exhibit 1035	High Scalability, *How Facebook Live Streams to 800,000 Simultaneous Viewers*, ByteByteGo (Jun. 27, 2016), https://blog.bytebytego.com/?utm_source=hs&utm_medium=ann&utm_campaign=top ("ByteGo")
Exhibit 1036	Hardeep Singh Parmar & Michael C. Thornburgh, *Adobe's Real Time Messaging Protocol*, Veriskope. (Dec. 21, 2002) ("Parmer")
Exhibit 1037	Ilya Grigorik, *WebRTC*, in High Performance Browser Networking, (2013) ("Grigorik")
Exhibit 1038	Sam Dutton, *Get started with WebRTC*, web.dev. (Jul. 23, 2012), https://web.dev/articles/webrtc-basics ("Dutton")
Exhibit 1039	Andy Salo, *MPEG DASH: A Technical Deep Dive and Look at What's Next*, RGB Networks, (2012) ("Salo")
Exhibit 1040	Jan Ozer, *Upstream, Justin.tv, Livestream, and Bambuser: Streaming Unplugged*, Streaming Media Magazine., Jun.–Jul. 2012 ("Ozer")

Exhibit 1041	Christopher Mueller, *MEPG-DASH vs. Apple HLS vs. Microsoft Smooth Streaming vs. Adobe HDS*, BITMOVIN. (Mar. 29, 2015), https://bitmovin.com/mpeg-dash-vs-apple-hls-vs-microsoft-smooth-streaming-vs-adobe-hds/ ("Mueller")
Exhibit 1042	Stefan Saroiu et al., *An analysis of Internet Content Delivery Systems*, ACM SIGOPS Operating System Review, Vol. 36 (Dec. 31, 2002), https://doi.org/10.1145/844128.84415 ("Saroiu")
Exhibit 1043	Charles Marion & Julien Jomier, *Real-time Collaborative Scientific WebGL Visualization with Websocket*, Ass'n Computing Machinery, August 4-5, 2012 ("Marion")
Exhibit 1044	Mark Sweney, *First ads appear on YouTube Clips*, Guardian, Aug. 22, 2007 ("Sweney")
Exhibit 1045	Richard Sandomir, *The Innovation That Grew and Grew*, N.Y. Times, June 12, 2014 ("Sandomir")
Exhibit 1046	Victoria Pimentel & Bradford G. Nickerson, *Communicating and Displaying Real-Time Data with WebSocket*, 16 IEEE (2012) ("Pimentel")
Exhibit 1047	Lucian Popa et al., *HTTP as the narrow waist of the future internet*, 2010 ACM SIGCOMM Workshop, October 2013 ("Popa")
Exhibit 1048	Reserved
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Exhibit 1069	No. 2:23-cv-00471-JRG; *SportsCastr Inc. (d/b/a PANDA Interactive) v. Genius Sports Ltd., et al*; Claim Construction Order (E.D. Tex. Aug. 25, 2025)
Exhibit 1070	Declaration of Jeanne M. Heffernan in Support of Admission *Pro Hac Vice*

Pursuant to 37 C.F.R. § 42.10(c)(2), and the Board's authorization for this filing given in Paper 6, Petitioner Genius Sports Ltd. ("Genius") respectfully submits this notice of intent to designate Jeanne M. Heffernan, a provisionally recognized PTAB attorney, as one of its back-up counsel in this proceeding.

Registered practitioner W. Todd Baker (Reg. No. 45,265) is serving as lead counsel for Petitioner in this proceeding. *See* Paper 2. The most recent prior proceedings in which Ms. Heffernan was recognized *pro hac vice* by order of the Board, pursuant to a motion of the type described in 37 C.F.R. §42.10(c)(1), were IPR2024-01307, IPR2024-01308, IPR2024-01309, and IPR2024-01311. Filed herewith is a certification in the form of a declaration in which Ms. Heffernan attests to satisfying all requirements set forth by the Board in Paper 6. A power of attorney from the Petitioner to Ms. Heffernan was previously filed in this proceeding on August 23, 2024. *See* Paper 2.

Date: October 24, 2025

Respectfully submitted,

/s/ *W. Todd Baker*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on October 24, 2025, via electronic mail directed to counsel of record for the Patent Owner as follows:

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