UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.,
Petitioner,

v.

CYANDIA, INC.,
Patent Owner.

IPR2024-01433
Patent 8,751,948

PETITIONER'S UPDATED
MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(3)

Pursuant to 37 C.F.R. §§ 42.8(a)(3) and 42.8(b)(2), Petitioner SAP America, Inc. updates its Mandatory Notices to list related IPRs and to inform the Board of two events in the parallel district court case:

- on March 25, 2025, the *Markman* hearing was rescheduled from April 2, 2025, to April 24, 2025;
- on March 27, 2025, the district court denied the parties' motions to transfer.

I. REAL PARTY-IN-INTEREST (UNCHANGED)

The real parties-in-interest are SAP America, Inc. ("Petitioner") and SAP SE.

II. RELATED MATTERS (UPDATED)

The '948 Patent (EX1001) has been asserted in the following litigation:

- *Cyandia, Inc. v. SAP America, Inc. et al*, Case No. 2-24-cv-00096 (E.D. Tex.), filed February 12, 2024 (the "district court case"). **On March 25, 2025, the Court rescheduled the *Markman* hearing from April 2, 2025, to April 24, 2025. On March 27, 2025, the Court denied Defendants' motion to transfer (Dkt. No. 18) and Plaintiff's cross-motion to transfer (Dkt. No. 45).**

USP 8,751,948 (EX1001) is also being challenged in the following Board proceeding:

- IPR2024-01432

Patents claiming priority to the same predecessor application that '948 Patent (EX1001) claims priority to are being challenged in the following Board proceedings:

- IPR2024-01495 (USP 8,578,285)
- IPR2024-01496 (USP 8,595,641)
- IPR2024-01432 (USP 8,751,948)

III. LEAD AND BACKUP COUNSEL (UNCHANGED)

Lead Counsel	Back-up Counsel
Roy Chamcharas (Reg. No. 61,735) roy.chamcharas@klarquist.com	Andrew M. Mason (Reg. No. 64,034) andrew.mason@klarquist.com Todd M. Siegel (Reg. No. 73,232) todd.siegel@klarquist.com Samuel B. Thacker (Reg. No. 78,633) samuel.thacker@klarquist.com
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IV. SERVICE INFORMATION (UNCHANGED)

Petitioner consents to service via email at the above email address and SAP_Cyandia_IPRs@klarquist.com.

Respectfully submitted,

Dated: March 27, 2025

By: /Roy Chamcharas/

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Counsel for Petitioner

CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that on March 27, 2025, Petitioner emailed a copy of **Petitioner's Updated Mandatory Notices** to the following email addresses, which Patent Owner has agreed constitutes service. *See* Paper 5 (Patent Owner's Mandatory Notices).

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