From:	Kenneth Darby
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Subject:	IPR2024-01442 - Petitioners Request for Director Review - Deere & Company v. David"s Dozer V-Loc System Inc.
Date:	Thursday, April 17, 2025 5:54:24 PM
Attachments:	2025-04-17 Paper 11 Request for Director Review.pdf

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Good afternoon, Director,

Deere & Company, the Petitioner in IPR2024-01442, respectfully recommends and requests Director Review or rehearing by the Delegated Review Panel of the Institution Decision issued in this proceeding. Attached is a copy of Petitioner's Request for Director Review submitted today via P-TACTS.

This Request seeks review of the Board Panel's conclusion that the prior art teaches away from the claimed invention and the combination Deere advanced in its Petition. As you'll see, the Panel ignored decades of Federal Circuit precedent on teaching away and compounded this error by failing to account for the multiple uncontested advantages that would have motivated a skilled artisan to pursue the combination and arrive at the claimed invention.

Respectfully,

Kenneth Darby :: Principal :: Fish & Richardson P.C.
512 226 8126
Counsel for Petitioner

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