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Paper No. ____

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case No. IPR2024-01448

Patent No. 11,737,372

PATENT OWNER'S PRELIMINARY RESPONSE

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LISTING OF EXHIBITS

Exhibit	Description
2001	RESERVED
2002	RESERVED
2003	RESERVED
2004	RESERVED
2005	RESERVED
2006	RESERVED
2007	RESERVED
2008	RESERVED
2009	RESERVED
2010	RESERVED
2011	RESERVED
2012	RESERVED
2013	RESERVED
2014	RESERVED
2015	RESERVED
2016	RESERVED
2017	Statutory Disclaimer Under 37 C.F.R. § 1.321(a)

I. INTRODUCTION

Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge”) submits this Preliminary Patent Owner Response to the Petition filed by Western Digital Technologies, Inc. (“Western Digital”) seeking *inter partes* review of claims 1-8 of U.S. Patent No. 11,737,372 (“the ’372 patent”).

II. STATUTORY DISCLAIMER UNDER 37 C.F.R. § 1.321(A)

On January 21, 2025, Patent Owner filed a statutory disclaimer, disclaiming claims 1-8 of the ’372 patent under 35 U.S.C. § 253(a) and in compliance with 37 C.F.R. § 1.321(a), using the form approved for such submissions by the Office and accompanied by the appropriate fee. Exhibit 2017.

III. CONCLUSION

Because “no *inter partes* review will be instituted based on disclaimed claims” (37 C.F.R. § 42.107(e)) and because all challenged claims of the ’372 Patent have been disclaimed, Patent Owner respectfully submits that institution of a trial here would be improper. *See Tandus Flooring, Inc. v. Interface, Inc.*, IPR2013-00526, Paper No. 7 (PTAB, February 14, 2014) (denying institution of trial because patent owner had disclaimed all of the challenged claims); *Inguran, LLC d/b/a Sexing Technologies v. Premium Genetics (UK) Ltd.*, IPR2016-00756, Paper No. 9 (PTAB, August 31, 2016) (same); *Borealis AG v. Berry Plastics Corporation*, IPR2016-00235, Paper No. 11 (PTAB, March 24, 2016) (same); *Coolit Systems, Inc. v. Asetek Danmark*, IPR2014-01172, Paper No. 12 (PTAB,

January 29, 2015) (same). Therefore, Patent Owner respectfully requests that the Petition be denied.

Respectfully submitted,
GODO KAISHA IP BRIDGE I

Date: January 23, 2025

/Gerald B. Hrycyszyn/
Gerald B. Hrycyszyn, Reg. No. 50,474
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CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24, the undersigned certifies that the foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** contains 255 words excluding; a table of contents, a table of authorities, a certificate of service or word count, or appendix of exhibits or claim listing. Patent Owner has relied on the word count feature of the word processing system used to create this paper in making this certification.

Date: January 23, 2025

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on January 23, 2025, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Petitioner, upon the following:

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