

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NUVEI TECHNOLOGIES, INC.

Petitioner,

v.

AUTOSCRIBE CORPORATION,

Patent Owners.

Case: IPR2025-00089
U.S. Patent No. 11,620,621

**PETITIONER'S UPDATED
MANDATORY NOTICES UNDER 37 C.F.R. §42.8**

TABLE OF EXHIBITS

Exhibit	Short Name	Description
EX1001	'621 Patent	U.S. Patent No. 11,620,621
EX1002	'621 File History	File History of U.S. Patent No. 11,620,621
EX1003	'185 File History	File History of U.S. Patent Application No. 15/408,185
EX1004	'545 File History	File History of U.S. Patent Application No. 13/679,545
EX1005	Almeroth Declaration	Declaration of Dr. Kevin Almeroth
EX1006	Almeroth CV	<i>Curriculum Vitae</i> of Dr. Keven Almeroth
EX1007	Stringfellow	U.S. Publication No. 2010/0174626 A1
EX1008	Kloster	U.S. Publication No. 2010/0094755 A1
EX1009	RFC 1738	Tim Berners-Lee et al., Request for Comments: 1738 (December 1994)
EX1010	RFC 2396	Tim Berners-Lee et al., Request for Comments: 2396 (August 1998)
EX1011	RFC 2616	Roy Fielding et al., Request for Comments: 2616 (June 1999)
EX1012	RFC 6101	Alan Freier et al., Request for Comments: 6101 (August 2011)
EX1013	Boyd	U.S. Pat. No. 8,126,778
EX1014	Raleigh	U.S. Pat. No. 10,248,996
EX1015	Petri	U.S. Pat. No. 9,785,988
EX1016	Nuvei Complaint	Doc. No. 1, Complaint, <i>Autoscribe Corp. v. Nuvei Corp., et al.</i> , No. 2:24-cv-0325-JRG (E.D. Tex.)
EX1017	M&A Complaint	Doc. No. 1, Complaint for Patent Infringement, <i>Autoscribe Corporation v. M&A Ventures, LLC</i> , No. 1:24-cv-04282-SCJ (N.D. Ga.)

Exhibit	Short Name	Description
EX1018	Carlson	U.S. Patent Pub. No. 2008/0319869A1
EX1019	Dierks	U.S. Pat. No. 7,953,642
EX1020	Agrawal	U.S. Pat. No. 9,324,098
EX1021	Collison	U.S. Pat. No. 9,830,596
EX1022	HTML 4.01	HTML 4.01 Specification, Chapter 16: Frames, Dec. 24, 1999, https://www.w3.org/TR/html401/present/frames.html#h-16.5
EX1023	Gage	U.S. Pat. No. 8,543,644
EX1024	PCI	Payment Card Industry (PCI) Data Security Standard – Requirements and Security Assessment Procedures Version 2.0 October 2010
EX1025	Klein	U.S. Patent Pub. No. 2012/0185561A1
EX1026	Waiver of Service	Doc. No. 9, Defendant Nuvei’s Unopposed Motion for Extension of Time to Move, Answer or Otherwise Respond to Plaintiff’s Complaint and Waiver of Summons and of Service Requirements, <i>Autoscribe Corporation v. Nuvei Corporation, et al.</i> , No. 2:24-cv-0325-JRG (E.D. Tex.)
EX1027	Grecia	U.S. Patent Pub. No. 2010/0185868A1
EX1028	Chambers	U.S. Patent Pub. No. 2012/0324225A1
EX1029	Palgon	U.S. Pat. No. 8,458,487
EX1030	<i>Sotera</i> Stipulation	District Court Defendants Stipulation Regarding Assertion of Prior Art Upon Institution

I. MANDATORY NOTICES UNDER 37 C.F.R. §42.8

A. Real Party in Interest (37 C.F.R. §42.8(b)(1))

The real parties in interest are Nuvei Technologies, Inc (Petitioner), Nuvei Corporation, and Nuvei Technologies Corporation.

Out of an abundance of caution and without conceding either party is a real party in interest, Petitioner further identifies Nuvei Limited and Nuvei International Group Limited, whom Autoscribe Corporation added as named defendants in *Autoscribe Corporation v. Nuvei Corporation et al*, Case No. 2-24-cv-00325, in the United States District Court for the Eastern District of Texas (“Nuvei Litigation”) in an Amended Complaint (Dkt. 35) filed after the filing of the Petition.

B. Related Matters (37 C.F.R. §42.8(b)(2))

1. Litigation

Petitioner is aware of the following lawsuits or related matters involving the '621 Patent:

Case Heading	Number	Court	Filed
<i>Autoscribe Corporation v. Repay Holdings Corp. et al</i>	2-23-cv-00349	E.D. TX	July, 27, 2023
<i>Autoscribe Corporation v. Fortis Payment Systems, LLC</i>	2-23-cv-00364	E.D. TX	Aug. 10, 2023
<i>Autoscribe Corporation v. Payment Savvy, LLC</i>	2-23-cv-00390	E.D. TX	Aug. 29, 2023
<i>Autoscribe Corporation v. Tsevo, LLC et al</i>	3-24-cv-00076	S.D. TX	Mar. 18, 2024
<i>Autoscribe Corporation v. PCI Booking Limited</i>	3-24-cv-00081	S.D. TX	Mar. 22, 2024
<i>Autoscribe Corporation v. Paysafe Limited et al</i>	3-24-cv-00104	S.D. TX	Apr. 11, 2024
<i>Autoscribe Corporation v. Nuvei Corporation et al</i>	2-24-cv-00325	E.D. TX	May 3, 2024

Petitioner identifies the following potentially relevant events that have occurred in the Nuvei Litigation after filing of the Petition:

In response to a Motion to Dismiss seeking to dismiss Petitioner Nuvei Technologies, Inc. for improper venue and RPI's Nuvei Corporation and Nuvei Technologies Corporation for lack of personal jurisdiction (Dkt. 15), on November 11, 2024, Autoscribe filed an Amended Complaint (Dkt. 35) that dropped Petitioner Nuvei Technologies, Inc. from the Nuvei Litigation and, instead named Nuvei Corporation, Nuvei Technologies Corporation, Nuvei Limited, and Nuvei International Group Limited ("Accused Nuvei Entities"). There are currently no cases pending against Petitioner Nuvei Technologies, Inc. asserting the '621 Patent.

On December 2, 2024, the Accused Nuvei Entities filed a Motion to Dismiss for lack of personal jurisdiction (Dkt. 41). That Motion remains pending.

On February 24, 2025, the Accused Nuvei Entities filed a Motion to Stay pending resolution of the jurisdictional motion (Dkt. 54). That Motion remains pending.

On March 24, 2025, the Accused Nuvei Entities sent to counsel for Autoscribe in the Nuvei Litigation a *Sotera* Stipulation. *See* EX1030.

2. *Administrative Proceedings*

The '621 Patent is subject to a IPR Petition IPR2024-01159 filed by M&A Ventures, LLC, Repay Holdings Corporation, and Repay Holdings, LLC (collectively, the "IPR2024-01159 Petitioners"). On January 29, 2025, the Board issued a Decision Denying Institution (IPR2024-01159, Paper 12). Petitioner Nuvei is neither in privity nor a real party in interest with any of the IPR2024-01159 Petitioners. *See also* Paper No. 1 at 7-8 (explaining differences in the mapping presented in this Petition relative to those in IPR2024-01159).

Date: April 8, 2025

By: /Eagle H. Robinson/
Eagle H. Robinson
Reg. No. 61,361

Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on April 8, 2025, a complete copy of this Petitioner's Updated Mandatory Notices Under 37 C.F.R. §42.8 was served on Patent Owner via email (by consent) to:

srajavolu@azalaw.com
eovcina@azalaw.com
cphillips@azalaw.com
cdeng@azalaw.com
jeffrey.wright@azalaw.com

/Eagle H. Robinson/
Eagle H. Robinson (Reg. No. 61,361)