

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DIGITAL GLOBAL SYSTEMS, INC.,
Petitioner,

v.

DEEPSIG INC.,
Patent Owner.

Case IPR2025-00194
Patent 11,777,540

**PATENT OWNER'S UPDATED MANDATORY NOTICES
CONCERNING STATUTORY DISCLAIMER OF PATENT CLAIMS AND
STATUS OF PARALLEL IPR PROCEEDINGS**

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Statutory Disclaimer of Claims 1-3 and 7-11, Power of Attorney, and Filing Receipt dated April 23, 2025 from USPTO

IPR2025-00194 Patent Owner's Updated Mandatory Notices

Patent Owner hereby submits these Updated Mandatory Notices pursuant to 37 C.F.R. § 42.8(a)(3). Patent Owner is only updating the Related Matters disclosures below, “Related Matters Under 37 C.F.R. § 42.8(b)(2),” including an explanation of how this update affects IPR2025-00194.

I. MANDATORY NOTICES

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

U.S. Patent No. 11,777,540 issued from an application related to U.S. Patent No. 11,018,704, which is the subject of IPR2024-01358, and to U.S. Patent No. 10,581,469, which is the subject of IPR2025-00049.

On March 19, 2025, the Board issued a Decision Granting Institution of *Inter Partes* Review in IPR2024-01358. That IPR is currently pending.

On March 27, 2025, the Board issued a Decision Denying Institution of *Inter Partes* Review in IPR2025-00049. In this Decision Denying Institution, the Board concluded that “on this record, Petitioner does not show sufficiently that the Jüschke and Holt combination teaches or suggests updating model parameters based on a distance metric computed between the transmit radio signal and a received signal that is obtained from the one or more radio receivers.” *See* IPR2025-00049, Paper 7 at 14.

On April 23, 2025, Patent Owner submitted a statutory disclaimer in Patent 11,777,540, the patent-at-issue in this IPR2025-00194. Patent Owner's statutory

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disclaimer disclaimed claims 1-3 and 7-11 of the '540 patent, thus leaving only claims 4-6 and 12-22. Claims 4-6 and 12-22 are not challenged in Ground 1 of the Petition. Claims 4-6, 12-14, and 16-22 are challenged only in Ground 2 of the Petition, based on a combination of Jüschke and Holt, the same prior art relied upon by Petitioner in IPR2025-00049.¹

Dated: May 7, 2025

Respectfully submitted,

/Wayne M. Helge/

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Lead Counsel for Patent Owner

¹ Claim 15 is not challenged in the Petition.

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2025, a true and correct copy of the foregoing document was served via email, by consent, to Petitioner by serving the correspondence email addresses of record as follows:

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Dated: May 7, 2025

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