

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.

Petitioner,

v.

INTELLECTUAL VENTURES II LLC,

Patent Owner.

Case No. IPR2025-00217
U.S. Patent No. 10,952,153

**BRIEF IN SUPPORT OF PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL**

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PATENT OWNER'S EXHIBIT LIST

Ex. 2001	Petitioner's Answer to Complaint and Counterclaim, dated June 20, 2024, in <i>Intellectual Ventures II LLC v. Tesla, Inc.</i> , C.A. 1:24-cv-00884-ADA (W.D. Tex.)
Ex. 2002	Docket from District Court Litigation, <i>Intellectual Ventures II LLC v. Tesla, Inc.</i> , C.A. 1:24-cv-00884-ADA (W.D. Tex.)
Ex. 2003	Scheduling Order from District Court Litigation, <i>Intellectual Ventures II LLC v. Tesla, Inc.</i> , C.A. 1:24-cv-00884-ADA (W.D. Tex.)
Ex. 2004	Defendant's Second Supplemental Preliminary Invalidity Contentions, dated January 9, 2025, in District Court Litigation, <i>Intellectual Ventures II LLC v. Tesla, Inc.</i> , C.A. 1:24-cv-00884-ADA (W.D. Tex.)

I. INTRODUCTION

Pursuant to the Memorandum by the Acting Director dated March 26, 2025, setting forth the “Interim Processes for PTAB Workload Management” (the Memorandum), Patent Owner hereby sets forth the applicable bases for discretionary denial of institution. This filing is being made within one month of the issuance of the Memorandum. As explained more fully below, all of the *Fintiv* factors, as well as several additional factors set forth in the Memorandum, favor the discretionary denial of institution in this case.

With respect to the *Fintiv* factors, Petitioner filed a Counterclaim on June 20, 2024 challenging the validity of U.S. Patent No. 10,952,153 (“153 Patent,” Ex. 1001) in *Intellectual Ventures II LLC v. Tesla, Inc.*, C.A. 1:24-cv-00884-ADA (W.D. Tex.) (the “Parallel Litigation.”) Ex. 2001, at 83-84 and Ex. 2002, at 6-7. As discussed in detail below, the Parallel Litigation has already progressed significantly, including completion of Preliminary Infringement and Invalidity Contentions, and the filing of all claim construction briefing. The Court is scheduled to hold the Markman Hearing in a few days (on April 10, 2025). By the anticipated date of the institution decision in this matter (July 9, 2025), the parties will be well into fact discovery, service of Final Infringement and Invalidity Contentions will be complete, and the Court will in all likelihood have issued its claim construction ruling. Ex. 2003, 2-3. The Trial is scheduled for May 14, 2026, about 2 months

before the statutory deadline for issuing a Final Written Decision in this matter on July 9, 2026. Ex. 2003, 4.¹

With respect to other factors identified in the Memorandum, the Petition relies heavily on expert testimony that largely parrots *verbatim* the wording of the Petition. In addition, the claims of the ‘153 Patent were in force for several years, and the patent has now expired. These factors also weigh in favor of a discretionary denial.

For all of these reasons, and as explained more fully below, the Director should exercise her discretion to deny institution.

II. THE FINTIV FACTORS FAVOR DISCRETIONARY DENIAL

The precedential order in *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (PTAB March 20, 2020) (“*Fintiv*”) identifies six factors for the Board to consider in deciding whether to exercise discretion to deny institution based on parallel proceedings involving the same patent. Application of the present facts to these factors demonstrates that there are strong reasons for exercising discretion to deny institution here.

¹ The Petition (at 77, note 7) incorrectly asserts that “[t]he district court has not entered an order scheduling a trial date.” As shown on the last page of the Court’s Scheduling Order, a jury trial is scheduled for May 14, 2026. Ex. 2003, 4.

A. Factor 1 Weighs Against Institution Because A Stay Has Not Been Granted In The Parallel Litigation And There Is No Evidence That A Stay Would Be Granted If This IPR Was Instituted

No stay has even been requested in the Parallel Litigation. Pet., 76. In addition, even if this IPR was instituted (which would not occur until on or around July 9, 2025) it is unlikely that the Court (Judge Albright) would grant a stay. *See, generally, Continental Intermodal Grp. v. Sand Revolution LLC*, No. 7:18-cv-00147 (W.D. Tex. July 22, 2020) (Judge Albright) *Multimedia Content Mgmt. LLC v. Dish Network*, No. 6:18-CV-00207-ADA, 2019 U.S. Dist. LEXIS (W.D. Tex. May 30, 2018) (Judge Albright) (denying stay).

Thus, the first factor weighs against institution.

B. Factor 2 Weighs Against Institution Because The Parallel Litigation Has A Trial Date Scheduled Before The Projected Statutory Deadline For The Board's Final Written Decision

The Trial in the Parallel Litigation is scheduled for May 14, 2026, about 2 months before the statutory deadline for issuing a Final Written Decision in this matter on July 9, 2026. Rather than looking at the actual date the trial is scheduled, the Petition relies on the median time from filing to case disposition in the Western District of Texas. However, on February 28, 2025, the Office *rescinded* former Director Vidal's 2022 memorandum on discretionary denials which had directed that such statistics be considered. The announcement rescinding former Director Vidal's 2022 memorandum went on to state that decisions relying on the 2022 memo will

be “neither binding or persuasive on the PTAB.” In view of the above, Petitioner’s arguments based on the time to trial statistics cannot be considered persuasive and must be rejected.

Given that the actual trial date is before the due date for the Final Written Decision, the second factor favors discretionary denial.

C. Factor 3 Weighs Against Institution Because The Parties Will Have Invested Significant Effort In The Parallel Litigation By The Time The Board’s Institution Decision Is Due

Factor 3 relates to investment in the Parallel Litigation by the District Court and the parties. *Fintiv*, Paper 11 at 9. This factor is judged from the date of the institution decision, which is expected to be no later than July 9, 2025. *Id.* By the time the Board’s institution decision is due, the following will have been completed in the Parallel Litigation:

- PO’s Preliminary Infringement Contentions (served August 1, 2024);
- Petitioner’s Preliminary Invalidity Contentions (served October 24, 2024);
- Parties exchanged claim terms for construction (November 14, 2024);
- Parties exchanged proposed claim constructions (December 5, 2024);
- Parties disclosed extrinsic evidence for claim construction (December 12, 2024);
- Petitioner’s Opening Claim Construction Brief (January 9, 2025);
- PO’s Responsive Claim Construction Brief (February 10, 2025);

- Petitioner’s Reply Claim Construction Brief (March 3, 2025);
- PO’s Sur-Reply Claim Construction Brief (March 24, 2025);
- Parties technical tutorials submitted to Court (March 31, 2025);
- Markman Hearing (scheduled for April 10, 2025);
- Fact discovery (opens April 11, 2025); and
- Final Infringement and Invalidity Contentions (due May 22, 2025).

Ex. 2003, 1-2. Clearly, the parties and the Court will have made a substantial investment in the Parallel Litigation by the expected date of the institution decision on July 9, 2025.

The Petition was filed on November 26, 2024. At that time, Petitioner asserted that “[t]he investment in the co-pending litigation has been minimal.” Pet., at 77. Patent Owner disagrees that the investment in the co-pending litigation was minimal as of November 26, 2024. However, even if Petitioner’s assertion about the state of affairs on November 26, 2024 was accurate, it is irrelevant. As explained in *Fintiv*, the investment in the Parallel Litigation by the District Court and the parties is judged from the date of the anticipated institution decision, which is expected to be about July 9, 2025 -- rather than November 26, 2024. *Fintiv*, Paper 11 at 9. There can be no argument that by July 9, 2025, the District Court and the parties will have made a substantial investment in the Parallel Litigation.

Thus, the third factor weighs against institution.

In a co-pending IPR challenging a different patent that is being asserted against Petitioner in the Parallel Litigation, Petitioner predicts that the Parallel Litigation will be bifurcated, causing delay of the trial date set forth in the Scheduling Order. *Tesla, Inc. v. Intellectual Ventures II LLC*, IPR2025-00218 (Paper 7), at 1. In support of this prediction,, Tesla relies on a Law360 article (IPR2025-00218 Ex. 1021) and a prior bifurcation order in an unrelated case (IPR2025-00218 Ex. 1020) involving unrelated parties. However, Tesla fails to acknowledge that the bifurcation order it cites resulted from the parties’ joint motion to bifurcate and stay certain counts of infringement under Rule 42(b)—a motion specific to three unrelated patents (U.S. Patent Nos. 7,219,027; 7,970,059; and 8,291,236). No such motion has been filed in the Parallel Litigation, nor has either party sought bifurcation of the district court proceedings. Tesla also omits a key portion of the Law360 article it relies upon, which states:

Judge Albright said he’s presiding right now over a case with ‘seven or eight’ patents, and the parties have made opposite requests about how to try the case. One side wants a single trial with all of the patents; the other has requested individual trials, one for each patent.

This further undercuts Tesla’s position, as it demonstrates that trial structure decisions are highly case-specific and depend on actual party requests—which are absent here. In short, there is no evidence in the record that the district court will

bifurcate the Parallel Litigation, and Tesla's argument rests entirely on speculation. Accordingly, Factor 3 continues to weigh in favor of discretionary denial.

D. Factor 4 Weighs Against Institution Because There Is Substantial Overlap Between The Parallel Litigation And This IPR

As mentioned above Petitioner filed a Counterclaim in the Parallel Litigation challenging the validity of '153 Patent as a whole. Ex. 2001, at 83-84. The Counterclaim is not limited to any particular claim(s) of the '153 Patent, and therefore covers all claims of the '153 Patent -- including the claims challenged in this IPR.

On January 9, 2025, Petitioner filed its Second Supplemental Preliminary Invalidity Contentions in the District Court. As explained below, there is complete overlap between the prior art references advanced by the Petitioner in this IPR and those advanced by the Petitioner in the Parallel Litigation. Set forth below is a summary of the grounds raised in the Petition, and the prior art asserted in each ground:

Grounds	Claims	Basis (pre-AIA)
#1	1-2, 4-5, 11-12, 14-15	35 U.S.C. §103 over Andersson in view of Baker and Khan
#2	3, 13	§103 over Andersson in view of Baker, Khan, and Dick
#3	1-2, 4-5, 10-12, 14-15, 20	§103 over Zeira in view of Baker, Khan, and Tong
#4	3, 13	§103 over Zeira in view of Baker, Khan, Tong, and Dick

Pet., 16. Set forth below is an excerpt from Petitioner’s Second Supplemental Preliminary Invalidity Contentions in the Parallel Litigation showing the prior art relied on by Petitioner for the challenging the ‘153 Patent in the District Court:

1. Prior Art Patents and Patent Publications

Ex. No.	Patent/ Publication	Referenced As	Publication / Priority Date
J1	U.S. Pat. App. Pub. No. 2004/0,190,485 A1	Khan	March 24, 2004
J2	U.S. Pat. No. 6,334,047 B1	Andersson	April 9, 1999
J3	U.S. Pat. No. 6,600,772 B1	Zeira	July 29, 2003
J4	U.S. Pat. No. 6,529,741 B1	Tong	March 4, 2003
J5	U.S. Pat. No. 7,493,133 B2	Krishnan	February 5, 2004
J6	U.S. Pat. No. 6,308,080 B1	Burt	October 23, 2001
J7	G.B. Pat. App. No. 2,341,294 A	Chambers	March 8, 2000
J8	U.S. Pat. App. Pub. No. 2001/0,036,238	Baker	March 21, 2001
J9	3GPP TS 25.221 v6.1.0	25.221 v6.1.0	June 2004
J10	3GPP TS 25.224 v6.1.0	25.224 v6.1.0	June 2004
J11	3GPP TS 25.331 v6.2.0	25.331 v6.2.0	June 2004
J12	U.S. Pat. App. Pub. No. 2004/0,077,370	Dick	April 22, 2004
J13	U.S. Pat. No. 8,194,618 B2	Iochi	April 28, 2004
J14	3GPP TS 25.896 v6.0.0	25.896 v6.0.0	March 2004
J15	3GPP TSG RAN1 Meeting #30, R1-030067	R1-030067	January 2003

Ex. 2004, 29; *see also*, 128-149. Thus, all of the prior art asserted in this IPR -- namely, Andersson, Khan, Baker, Dick, Zeira and Tong -- is also being asserted in the Parallel Litigation.

At the time the Petition was filed on November 26, 2024, Petitioner argued that “[t]he extent of overlap is ... speculative at this point in time.” Pet., at 78. However, on January 9, 2025, Petitioner filed its Second Supplemental Preliminary Invalidity Contentions in the Parallel Litigation setting forth in detail Petitioner’s invalidity contentions for the ‘153 Patent in the Parallel Litigation, which rely on the same references asserted in this IPR. At this point in time, the complete overlap between the proceedings is far from being “speculative,” it is now an undeniable fact.

Because there is complete overlap between this IPR and the Parallel Litigation, there are particularly strong “concerns of inefficiency and the possibility of conflicting decision” if this IPR is instituted. *Fintiv*, Paper 11 at 12.

Thus, the fourth factor weighs against institution.

As noted above, Petitioner filed this IPR on November 26, 2024. Several weeks later, on January 9, 2025, Petitioner filed its Second Supplemental Preliminary Invalidity Contentions in the District Court -- a detailed 241-page document that did not materialize overnight. Ex. 2004. Clearly, at the time Petitioner filed this IPR on November 26, 2024, Petitioner had every reason to

anticipate that there would be significant overlap between the prior art references advanced by the Petitioner in this IPR and those advanced by the Petitioner in the Parallel Litigation. After all, the issue of overlap is completely within Petitioner's control -- as Petitioner is the party that chose which references to assert in each forum. However, rather than deal with the overlap that Petitioner could have certainly foreseen, Petitioner made the strategic decision in the Petition to characterize the extent of overlap as "speculative." Pet., 78. To the extent Petitioner abandon's that position in its reply in favor of a *Sotera* stipulation, Petitioner's stipulation should be rejected.

In *SAS Institute Inc. v. Iancu*, 138 S. Ct. 1348, (2018), the United States Supreme Court held that an IPR must proceed in accordance with the petition. *SAS Inst., Inc. v. Iancu*, 584 U.S. 357, 365 (2018); see 35 U.S.C. § 312(a)(3). Because of the expedited nature of IPR proceedings, "[i]t is of the utmost importance that petitioners in the IPR proceedings adhere to the requirement that the initial petition" layout the entirety of Petitioner's position, including all of Petitioner's theories and evidence. *Henny Penny Corp. v. Frymaster LLC*, 938 F.3d 1324, 1330 (Fed. Cir. 2019). This requirement extends to a Petitioner's theories as to why discretionary denial is not warranted, which likewise should be set forth in the Petition. In fact, the rules authorize a pre-institution reply only in circumstances where "good cause" exists, and a Petitioner lacks "good cause" to reply to arguments that the Petitioner

should have anticipated would have been made by Patent Owner. 37 C.F.R. 42.108(c) (“A petitioner may seek leave to file a reply to the preliminary response in accordance with §§ 42.23 and 42.24(c). Any such request must make a showing of good cause.”)

Moreover, even in cases where a Petitioner is granted an opportunity to file a pre-institution reply, the rules are clear that a Petitioner cannot pivot to a new theory in a reply, but instead “may only respond to arguments raised in the corresponding opposition.” 37 C.F.R. 42.23(b); see e.g., *Juniper Networks, Inc. v. Swarm Technology, LLC*, IPR2021-01445, Paper 62 (P.T.A.B. 2023) (refusing to consider new theory presented for first time in a reply and citing statement in Trial Practice Guide that a “Petitioner may not submit new evidence or arguments in reply that it could have presented earlier”) (*citing*, Patent Trial and Appeal Board Consolidated Practice Guide 73 (Nov. 2019)). “Respond” in the context of 37 C.F.R. § 42.23(b), does not mean proceed in a new direction with a new approach as compared to the positions taken in a prior filing.” *Juniper Networks*, Paper 62, at 28. “While replies and sur-replies can help crystallize issues for decision, a reply or sur-reply that raises a new issue or belatedly presents evidence may not be considered.” *Id.*

As noted above, the issue of overlap was completely within Petitioner’s knowledge and control and, as a result, when Petitioner filed this IPR, Petitioner had every reason to foresee the overlap that Petitioner would create between this IPR and

the Parallel Litigation. Nonetheless, Petitioner made the strategic decision to characterize the extent of overlap as “speculative” in the Petition. Pet., 78. If the Petitioner attempts in its reply to pivot from its “speculative” argument in the Petition to a *Sotera* stipulation, Petitioner would be improperly proceeding “in a new direction with a new approach as compared to the positions taken in a prior filing.” *Juniper Networks*, Paper 62, at 28. Accordingly, to the extent Petitioner belatedly submits a *Sotera* stipulation with its reply, the stipulation should be rejected as beyond the scope of a proper reply.

E. Factor 5 Weighs Against Institution Because The Patent Owner Is The Same And The Petitioner Are The Same Parties As In The Parallel Litigation

Patent Owner and Petitioner are the same parties as in the Parallel Litigation. Thus, the fifth factor weighs against institution.

F. Factor 6 Weighs Against Institution Because The Merits Of Petitioner’s Challenge Is Weak

The challenges set forth in the Petition are flawed. For example, the Petition extensively relies on an expert declaration that largely parrots *verbatim* the wording of the Petition. Ex. 1003. For example, the following paragraphs of the expert declaration essentially parrot the Petition word-for-word: Ex. 1003, ¶¶ 46-51, 53, 56-84, 88-94, 96-102, 104-149, 151, 152, 156-177.² The differences between the

² The portions of the expert declaration that do not parrot the Petition include information such as the expert’s background, the materials he considered, and

wording of these paragraphs from the declaration and that of the Petition are insubstantial. For example, in cases where the Petition provides a point citation to a given reference, the declaration includes a quotation from the reference corresponding to the point citation. For these reasons, the declaration is entitled to little if any weight. *Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 at 15-17 (PTAB August 24, 2022) (designated precedential) (according “little weight” to declaration testimony that contains a verbatim restatement of a petition’s conclusory assertions without additional supporting evidence or reasoning). The Petition’s extensive reliance on expert testimony that is a mostly verbatim restatement of the Petition is a further factor that favors discretionary denial. *See also, Facebook v. Windy City Innovations, LLC*, 973 F.3d 1321, 1340-41 (Fed. Cir. 2020) (affirming the Board’s holding that claim was not unpatentable when “the Board considered Facebook’s expert’s testimony but determined that it did not add materially to Petitioner’s unpersuasive attorney argument,” “because it merely repeated Petitioner’s argument, nearly verbatim, without citation to the basis for his testimony.”)

Thus, the sixth factor weighs against institution.

boilerplate describing application legal standards. (Ex. 1003, ¶¶ 1-28 (background of expert and materials considered), ¶¶ 29-32 (level of ordinary skill in the art), and ¶¶ 33-36 (legal standards)).

In summary, all of the *Fintiv* factors weigh against institution. Under §314(a) and, based on the totality of the *Fintiv* factors, institution should be denied.

III. ADDITIONAL FACTORS SET FORTH IN THE MEMORANDUM SUPPORT DISCRETIONARY DENIAL

In addition to the *Fintiv* factors that support a discretionary denial under 35 U.S.C. § 314(a), the Petition’s impermissible and excessive reliance on expert testimony exceeds the statutory scope of inter partes review by improperly supplementing the prior art through a voluminous expert declaration. These circumstances provide a further basis for the Director to exercise discretion and deny institution.

One of the relevant considerations for discretionary denial under 35 U.S.C. § 314(a), as identified in the Memorandum, is “[t]he extent of the petition’s reliance on expert testimony.” Memorandum, at 1. In this case, the Petition relies heavily on a 101-page expert declaration (Ex 1003) comprising 178 paragraphs—well beyond what is appropriate under the statutory framework governing inter partes review.

Specifically, under 35 U.S.C. § 311(b), “[a] petitioner in an inter partes review may request to cancel as unpatentable 1 or more claims of a patent only on a ground that could be raised under section 102 or 103 and only on the basis of prior art consisting of patents or printed publications.”

Here, the Petition impermissibly relies on the declaration of its expert to fill gaps in the mappings that are not met by the references that are relied on. For example, claim 1 of the ‘153 Patent recites “receiv[ing], from the network device, on a single physical channel, scheduling information and power control information” The references cited by Petitioner do not disclose a single physical channel that carries both scheduling information and power control information. Nevertheless, the expert asserts, without support:

[A]ndersson recognized that “other bits” may be transmitted along with the TPC command and power control indicator in the dedicated physical control channel (DPCCH). Andersson 9:14-21. A POSITA would have found it obvious that those other bits may include a scheduling grant as described by Khan.

Ex. 2003 at ¶ 76 (emphasis added).

For another example, claim 1 of the ‘153 Patent recites “receiv[ing], from a network device, an indication that transmit power control (TPC) command accumulation is enabled.” The references cited by the Petitioner do not disclose an indication of TPC command accumulation is enabled, as used in the claim. Nevertheless, the expert asserts, without support:

[T]he “power control indicator may be communicated through one or more flag bits, allowing two or more power control schemes to be implemented. Andersson, 9:6-7, 10:58-61. Consequently, the power control indicator instructs a mobile station to *enable* one of two or more types of power control adjustment. In other words, the power control “indicator” is an *indication* that a particular type of power control adjustment is *enabled*. And, a well-known type of power control adjustment before the ‘153 patent was TPC accumulation.

Ex. 2003 at ¶ 90 (emphasis added).

Neither of these substitutions amount to a reasonable interpretation of the reference, but rather are an impermissible effort to rewrite the prior art to meet the claim limitations. Such expert testimony goes beyond interpreting the printed publication and instead attempts to supply missing elements, in direct violation of 35 U.S.C. § 311(b). Gap-filling of this nature is particularly inappropriate where, as here, the expert declaration largely mirrors the Petition’s language without offering independent analysis. These aspects of the present challenge further support a discretionary denial under § 314(a).

Given the extensive and improper use of expert testimony, the Petition fails to comply with statutory requirements and undermines the integrity of the IPR process. Accordingly, this factor further supports discretionary denial under 35 U.S.C. § 314(a) and the guidance of the Memorandum. The Director should exercise her discretion and deny institution.

A. The ‘153 Is Expired

A further relevant consideration identified in the Memorandum was “[s]ettled expectations of the parties, such as the length of time the claims have been in force.” Memorandum, at 1. In this case, the claims of the ‘153 Patent expired on August 12, 2024. The fact that the ‘153 Patent has been expired for 8 months is a further factor

that favors discretionary denial.

IV. CONCLUSION

Institution of inter partes review should be denied under 35 U.S.C. § 314(a) based on the totality of the circumstances presented in this case. All six *Fintiv* factors weigh against institution, including the advanced stage of the Parallel Litigation, the scheduled trial date occurring before the projected Final Written Decision, the parties' substantial investment in the litigation, and the complete overlap of parties, issues, and prior art between the district court and this IPR. These factors raise serious concerns about duplicative proceedings, inefficiency, and the risk of conflicting outcomes.

In addition to the *Fintiv* factors, the circumstances identified in the Acting Director's March 26, 2025 Memorandum—particularly the Petition's improper use of expert testimony as a substitute for prior art, and the fact that the 153 Patent has already expired—further support discretionary denial under § 314(a).

Each of these issues independently supports discretionary denial. Considered together, they present a compelling case for the Director to exercise her discretion and deny institution of this untimely and inefficient Petition in accordance with § 314(a).

Respectfully submitted,

Dated: April 8, 2025

By: /Brandon R. Theiss/
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Counsel for Patent Owner
Intellectual Ventures II LLC

CERTIFICATE OF COMPLIANCE WITH WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), I certify that this **BRIEF IN SUPPORT OF PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL** complies with the type-volume limits set forth in the Memorandum and 37 C.F.R. § 42.24 because it contains 3,628 words, excluding the parts of the Brief that are exempted by 37 C.F.R. § 42.24(a), according to the word processing system used to prepare this Brief.

Respectfully submitted,

Dated: April 8, 2025

By: /Brandon R. Theiss/
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*Counsel for Patent Owner
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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **BRIEF IN SUPPORT OF PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL** was served via email (as consented to by counsel) on April 8, 2025 to lead and backup counsel of record for Petitioner as follows:

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