

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,
Petitioners

v.

ZAXCOM, INC.,
Patent Owner

Case IPR2025-00232
U.S. Patent 10,276,207

PATENT OWNER'S RESPONSE TO PETITIONER'S
OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. § 42.64(b)(2)

Pursuant to 37 C.F.R. § 42.64(b)(2), Zaxcom, Inc. (“Patent Owner”) responds to Paper 21, Petitioners’ Objections to Documents Downloadable During Deposition of Dr. Chris Kyriakakis (“Objections”). Patent owner reserves the right to present further objections as allowed by the applicable rules or other authority. Regarding Petitioners procedural objections, Petitioners’ objections should be overruled.

First, Petitioners contend that Zaxcom did not properly serve the documents under 37 C.F.R. §§ 42.6(e) and 42.63(e), however the documents were made available to all parties contemporaneously during the deposition of Petitioners’ expert, Dr. Chris Kyriakakis (“Deposition”). Petitioners had full access to these materials at the time of the deposition and suffered no prejudice. Four of the five exhibits used were Petitioners’ own exhibits and one of them was written by Dr. Kyriakakis. Petitioners’ counsel, Michael Fisher, agreed to downloading the documents from a chat link provided by the Deposition reporting company, and made no objection to service of the documents in that format at the time of download. The first notice to Patent Owner regarding any service of the exhibits occurred with the filing of the Objections.

Second, Petitioners note that the exhibits were improperly labelled. Five exhibits were utilized in the deposition, four of which are Petitioners’ exhibits. These exhibits are labeled in the deposition transcript as Exhibits 1 – 5, and Patent Owner provides a reference table below clarifying which exhibits 1-5 correspond to the exhibits, which are all already of record (with the exception of U.S. Patent No. 7,711,443 in the IPR2025-00232):

Deposition Exhibit No.	Name	‘443 Exhibit No.	‘207 Exhibit No.
1	Declaration of Dr. Kyriakakis	1002	1002
2	IPR2018-00972 Final Written Decision (“Judgment”)	1014	1014
3	U.S. Patent No. 6,825,875	1003	1003
4	U.S. Patent No. 7,711,443	1001	N/A
5	NAGRA V 24 bit Linear Location Recorder	2018	2018

For the purposes of the deposition, the exhibits were clearly identified and numbered sequentially and understood by the Deponent. Petitioners themselves acknowledge that they can and will refer to the exhibits by this designation. Any deviation is a clerical matter, which Patent Owner endeavors to correct in the record in consultation with Petitioners or via motion to the Board.

Finally, none of the exhibits addressed in the Objections were used as exhibits in the Deposition. Patent Owner also reserves the right to use any unused Deposition exhibits in support of future papers filed herein, at which point they will be properly introduced into the record.

I. “Dr. Chris Kyriakakis Deposition Exhibit 27” (“M68HC11E Family Data Sheet”)

A. Relevancy

The objection under FRE 401, 402, and 403 should be overruled. First, these generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. Furthermore, FRE 401 states that the evidence is relevant if “(a) it has any tendency

to make a fact more or less probable than it would be without the evidence; and (b) the fact is of consequence in determining the action.” Federal Rules of Evidence (“FRE”) 401. FRE 402 recites that relevant evidence is admissible unless an exception applies, and irrelevant evidence is inadmissible. FRE 403 states that the “court may exclude relevant evidence if its probative value is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.” FRE 403.

Petitioners’ claim that the document is irrelevant because neither Patent Owner nor its expert cited it, has no basis in the Rules of Evidence. The 68HC11 is identified in Strub as the system controller 301, which is referenced in the Petition. The teachings of Strub, particularly the disclosure intended to teach one of skill in the art how to make the invention, are relevant to whether Strub’s specification is enabling, which is a central issue in the case. Strub identifies the Motorola 68HC11 by name. Strub states “a system controller for use in a recording unit according to the invention can be embodied by a Motorola 68HC11 microcontroller (as is commercially available) appropriately programmed, as can readily be done by those skilled in the art, to accomplish the desired functions of the system controller, as described herein.” Ex-1003, 14:7-13. Thus, the M68HC11E Family Data Sheet (“Data Sheet”) adds technical details as to whether or not Strub teaches a working embodiment of the invention and whether its specification is enabled. Relevance does not depend on who cited the document, but on whether the document makes a material fact more or less probable, as is the case with Exhibit 27. Furthermore, Petitioners’ objections do not identify what specific prejudice, confusion, or waste would occur from admitting this evidence.

Accordingly, because the Data Sheet is relevant under FRE 401, admissible under FRE 402, and its probative value is not substantially outweighed under FRE 403, the objection should be overruled.

B. Hearsay

The objection under FRE 801 and 802 should be overruled. First, these generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. The relevant part of FRE 801 states that hearsay is an out of court statement to prove the truth of the matter asserted. FRE 802 states that hearsay is not admissible unless a federal statute, the federal rules of evidence, or other Supreme Court rule applies. Petitioners erroneously claim that the Data Sheet is considered hearsay, but its purpose is not to prove the truth of the matter asserted, but rather to show the specifications of a 68HC11 microcontroller, which is identified in Strub.

Even if the Data Sheet is considered hearsay, then the Data Sheet would fall under an exception, as described in at least FRE 803(17), and 807. FRE 803(17) allows for market quotations, lists, directories, or other compilations that are generally relied on by the public or by persons in particular occupations. FRE 807 allows for a hearsay statement to be admissible if the “statement is supported by sufficient guarantees of trustworthiness-after considering the totality of the circumstances under which it was made and evidence, if any, corroborating the statement; and it is more probative on the point for which it is offered than any other evidence that the proponent can obtained through reasonable efforts.” FRE 807.

The Data Sheet meets both of these exceptions. It was prepared and published in the ordinary course of business for the purpose of providing accurate technical information to

engineers, and the like. There would be no better evidence than a product manual originating from the manufacturer, as discussed below.

Courts have recognized that similar industry publications fall within these exceptions. *See Susemihl v. United S.S. Co. (Bah.)*, 1988 U.S. App. LEXIS 21219, at *4-5 (4th Cir. 1988) (finding that a manufacturer's brochure was a published commercial compilation generally relied on by potential purchasers of the manufacturer's product and therefore admitted under 803(17)). *See also United States v. Grossman*, 614 F.2d 295, 297 (1st Cir. 1980) (admitting a manufacturer's catalogue under Rule 803(17) to allow a jury to identify stolen merchandise by comparison to merchandise pictured in catalogue); *Barber v. Fairbanks Capital Corp.*, 2003 Bankr. LEXIS 2359 (Bankr. E.D. Pa. 2003) (taking judicial notice of an Insurance Manual "since it is well-used and readily available, and also not excludable hearsay under FRE 803(17), because it is a commercial publication that is generally used and relied upon by persons in the Pennsylvania title insurance industry"); *Conoco Inc. v. U.S. Dep't of Energy*, 99 F.3d 387, 393 (Fed. Cir. 1996) (noting that "market reports, telephone directories, weather reports, mortality tables, or like documents" would be permissible under 803(17), but purchase summaries that were "not prepared with the view that they would be in general use by an industry or members of the public having a general need to rely on information of that type" would not be permissible under 803(17)).

Accordingly, the Data Sheet should not be considered hearsay under FRE 801, however, if it were, it would fall under an exception, as illustrated in FRE 803 and FRE 807.

C. Authenticity

The objection under FRE 901 and 902 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. FRE 901(a) states that the “proponent must produce evidence sufficient to support a finding that the item is what the proponent claims it is.” FRE 901(a). FRE 901(b) provides examples of evidence that satisfies the authentication requirement, such as “evidence describing a process or system and showing that it produces an accurate result.” FRE 901(b).

Here, the Data Sheet satisfies FRE 901 because it is identifiable as a manufacturer-issued technical document, and its contents are consistent with the microcontroller referenced in Strub. The Data Sheet was downloaded directly from NXP Semiconductors’ official website (<https://www.nxp.com/docs/en/data-sheet/M68HC11E.pdf>). A declaration from counsel for Patent Owner attesting to the date and download manner, and identifying the source URL, is submitted as Exhibit 2029. The Data Sheet was published by Freescale Semiconductor, the successor to Motorola’s semiconductor division, and also bears the Motorola name (see, e.g., pg. 219). Freescale drafted and distributed data sheets in the ordinary course of its business to provide engineers and customers with accurate specifications. This particular version (Rev. 5.1, 07/2005) states the Freescale name and logo, a revision history, a copyright notice, and instructions for contacting the company with any questions. These features show that the Data Sheet originated directly from the company responsible for designing and manufacturing the 68HC11 microcontroller.

Further, FRE 902 states a list of examples that are “self-authenticating.” For example, FRE 902(5) states a “book, pamphlet, or other publication purporting to be issued by a public authority,” while FRE 902(11) allows for “certified domestic records of a regularly conducted activity” that meet the requirements of Rule 803(6). FRE 902. The Data Sheet, which was

created and maintained in the ordinary course of business and distributed broadly to engineers, meets this requirement as a record regularly relied upon in the industry.

Together, the official source, the declaration, and the document's distinctive features establish authenticity, and Petitioners' objections should be overruled.

II. "Dr. Chris Kyriakakis Deposition Exhibit 28" ("Instructions for Use...Mikroport Body-Pack Transmitter...SK 50...SK250")

A. Remainder of or Related Writings

Petitioners' objection under FRE 106 should be overruled. FRE 106 states that if "a party introduces all or part of a statement, an adverse party may require the introduction, at that time, of any other party...that in fairness ought to be considered at the same time." FRE 106. Exhibit 28, however, is a complete "Instructions for Use" manual prepared and issued by Sennheiser for the SK 50 and SK 250 transmitters. The document contains a full table of contents, complete sections, and ends with licensing regulations and technical descriptions. Exhibit 28 also includes a blank page 30 to illustrate that the document is full and complete. Petitioners have not pointed to any omitted pages or writings that would be necessary to meet the requirements of FRE 106. Petitioners merely state that "Petitioners object to this document as incomplete under FRE 106." These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. Thus, this objection should be overruled.

B. Relevancy

As explained earlier, FRE 401-403 state that evidence is relevant if it tends to make a fact more or less probable, and relevant evidence is admissible unless it is substantially outweighed by a risk of prejudice or confusion. Petitioners' objection should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond

and correct. Petitioners' claim that the document is irrelevant because allegedly neither the Patent Owner nor its expert cited it. However, this has no basis in the Rules of Evidence. Petitioners fail to mention that SK50 was identified in the Petitioners' expert declaration (Ex-1002, pg. 27).

Nonetheless, relevance does not depend on who cited the document, but on whether the document makes a material fact more or less probable, like Exhibit 28 does. It provides a technical specification on the Sennheiser SK 50 and SK 250 transmitters. The manual identifies a variety of technical information, all which directly bears on what the equipment cited by Petitioners' expert does and how it is operated.

Furthermore, Petitioners' objections do not identify what specific prejudice, confusion, or waste would occur from admitting this evidence. Additionally, Petitioners' objection that the document is undated should not go against its admissibility, since a lack of date does not erase its probative value under FRE 401-403. Accordingly, because Exhibit 28 is relevant under FRE 401, admissible under FRE 402, and its probative value is not substantially outweighed under FRE 403, the objection should be overruled.

C. Hearsay

The objection under FRE 801 and 802 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 801-802 exclude hearsay only when an out-of-court statement is offered for the truth of the matter asserted. Exhibit 28 is being offered to show that the SK50 transmitter is the specific transmitter mentioned in the declaration of Dr. Chris Kyriakakis, Petitioners' own expert. This is a permissible, non-hearsay purpose.

Even if the Board considers Exhibit 28 to be hearsay, it qualifies for exceptions at least under FRE 803(17) and FRE 807. FRE 803(17) allows admission of commercial publications that are generally relied upon by the public or by professionals in a related occupation. Instruction manuals for complex electronic equipment like the SK 50 and SK 250 are the kind of publication engineers and other professionals depend on. FRE 807 allows for a catch all exception to hearsay. Here, the manual would be considered trustworthy, having been created and distributed by the manufacturer in the ordinary course of its business. It would also be considered more probative of the features and operation than any other secondary summary. Courts have routinely admitted manufacturer brochures under these exceptions, and thus the objection should be overruled. *See Susemihl v. United S.S. Co. (Bah.)*, 1988 U.S. App. LEXIS 21219 (4th Cir. 1988); *see also United States v. Grossman*, 614 F.2d 295, 297 (1st Cir. 1980).

D. Authenticity

The objection under FRE 901 and 902 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 901 requires evidence sufficient to support a finding that the document is what it purports to be, and FRE 902 identifies some examples of documents that are self-authenticating. Exhibit 28 satisfies both of these requirements. Exhibit 28 was downloaded directly from the following website

(https://www.talamas.com/sites/default/files/rentals/Sennheiser/application/pdf/sennheiser-em3032-sk50-wireless-microphone-system-belt-pack-transmitter_0.pdf). A declaration from Patent Owner's counsel owner attesting to the date and download manner, and identifying the source URL, is submitted as Exhibit 2029. It is identifiable as a Sennheiser-issued instruction manual. The cover page bears the title "Instructions for Use-Mikroport Body-Pack Transmitter

SK 50/SK 250” and references the two transmitter models. The manual includes technical diagrams, frequency tables, operating instructions, and specifications unique to the design. Additionally, the manual was prepared and distributed by Sennheiser in the ordinary course of business to customers and users of its products. Under FRE 901(a), these characteristics are more than sufficient to support a finding of authenticity. Further, the Exhibit could also be defined as self-authenticating, at least under the definitions of FRE 902(5) and 902(11), due to these instructions for use being maintained by Sennheiser in the ordinary course of business and being distributed broadly to engineers and other professionals. Accordingly, the combination of the official source, sworn declaration, and document characteristics satisfies Rule 901(a), and Petitioners’ objections under FRE 901 and 902 should be overruled.

III. Dr. Chris Kyriakakis Deposition Exhibits 29, 30, and 31 (“Federal Agencies Digitization Guidelines Initiative,” subtitled “Term: Multichannel (audio)”, “Term: Channel (audio)”, and “Term: Track (audio)”)

Exhibits 29, 30, and 31, will all be addressed in this section as all three exhibits are different printouts of three terms originating from the Federal Agencies Digitization Guidelines Initiative. Further, all three exhibits received the same three objections-relevancy, hearsay, and authenticity, from the Petitioners, without any being particularly different from one another.

A. Relevancy

As explained earlier, FRE 401-403 state that evidence is relevant if it tends to make a fact more or less probable, and relevant evidence is admissible unless it is substantially outweighed by a risk of prejudice or confusion. Petitioners’ objections should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. Petitioners’ claim that the document is irrelevant because

allegedly neither the Patent Owner nor its expert cited it. In either case, Petitioners' expert used or cited to the term multichannel in his declaration (Ex-1002, pp. 7-8, 22), channel (Ex-1002, pp. 22, 106-107), and track (Ex-1002, pp. 7, 22, 24, 29, 45, 113, 114, 135, 136, 145, 150, 151). It would, thus, follow that clarification on these terms would be necessitated during deposition of the Petitioners' expert. Nonetheless, this objection has no basis in the Rules of Evidence since relevance does not depend on who cited the document, but on whether the document makes a material fact more or less probable, such as is the case with Exhibits 29-31. They provide a technical definition of "Multichannel (audio)", "Channel (audio)", "Track (audio)", respectively, from a recognized federal glossary, clarifying a term relevant in the art and this proceeding. Additionally, Petitioners' objection that the document is undated should not go against its admissibility, since a lack of date does not erase their probative value under FRE 401-403.

Furthermore, Petitioners' objections do not identify what specific prejudice, confusion, or waste would occur from admitting this evidence. The definition on the Federal Agencies Digitization Guidelines Initiative website shows its probative value. Finally, Exhibits 29-31 are each offered for technical context showing how "Multichannel (audio)", "Channel (audio)", "Track (audio)" are defined and understood in professional usage. Accordingly, because Exhibits 29-31 are relevant under FRE 401, admissible under FRE 402, and their probative value is not substantially outweighed under FRE 403, the objections should be overruled.

B. Hearsay

The objections under FRE 801 and 802 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 801-802 exclude hearsay only when an out-of-court statement is

offered for the truth of the matter asserted. Exhibits 29-31 are being offered to show how a relevant government glossary defines the term. This is a permissible, non-hearsay purpose.

Even if the Board considers Exhibits 29, 30, or 31 to be hearsay, either qualifies for exceptions at least under FRE 803(17) and FRE 807. FRE 803(17) allows admission of commercial publications that are generally relied upon by the public or by professionals in a related occupation. Glossaries of these kinds are the type of publications relied upon by engineers and other professionals. FRE 807 allows for a catch all exception to hearsay. Here, the glossary bears a great weight of trustworthiness due to it being created and maintained by federal agencies and thus would be considered more probative than other glossaries. *See Susemihl v. United S.S. Co. (Bah.)*, 1988 U.S. App. LEXIS 21219 (4th Cir. 1988); *see also United States v. Grossman*, 614 F.2d 295, 297 (1st Cir. 1980). Thus, this objection should be overruled.

C. Authenticity

The objection under FRE 901 and 902 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 901 requires evidence sufficient to support a finding that the document is what it purports to be, and FRE 902 identifies some examples of documents that are self-authenticating. Exhibits 29-31 satisfy both of these requirements. Exhibit 29 was downloaded directly from the official government website of the Federal Agencies Digitization Guidelines Initiative (<https://www.digitizationguidelines.gov/term.php?term=multichannelaudio>). Exhibit 30 was downloaded from the official government website of the Federal Agencies Digitization Guidelines Initiative (<https://www.digitizationguidelines.gov/term.php?term=channelaudio>). Exhibit 31 was downloaded from the official government website of the Federal Agencies Digitization Guidelines Initiative

(<https://www.digitizationguidelines.gov/term.php?term=trackaudio>). A declaration from Patent Owner's counsel attesting to the date and download manner, and identifying the source URLs, is submitted as Exhibit 2029. Each of Exhibits 29-31 shows a webpage printout from the official domain "digitizationguidelines.gov." The Federal Agencies Digitization Guidelines Initiative is a collaborative project of U.S. federal agencies. The Exhibits shows the official webpage format, including the site header, navigation menus, and the glossary entry. These features confirm that it is an official publication. Lastly, because it originates directly from federal agencies, the initiative is an authoritative body whose publications are regularly relied upon by technical professionals. Under FRE 901(a), these characteristics are more than sufficient to support a finding of authenticity. Further, the Exhibits could also be defined as self-authenticating, at least under the definitions of FRE 902(5) and 902(11), due to the glossary being maintained by various federal agencies in the ordinary course of business and is made available to the public. Accordingly, the declaration, combined with the aforementioned characteristics are sufficient to establish authenticity, thus, Petitioners' objections under FRE 901 and 902 should be overruled.

IV. "Dr. Chris Kyriakakis Deposition Exhibit 34" ("Sennheiser SK 5012 Instruction Manual")

A. Relevancy

As explained earlier, FRE 401-403 state that evidence is relevant if it tends to make a fact more or less probable, and relevant evidence is admissible unless it is substantially outweighed by a risk of prejudice or confusion. Petitioners' objection should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. Petitioners' claim that the document is irrelevant because neither Patent Owner nor its expert cited it has no basis in the Rules of Evidence. Exhibit 34 is directly relevant because it provides technical instructions and specifications of the SK 5012 transmitter. This information is

probative of what the product was, how it operated, and what a person of skill in the art would have understood. Additionally, Petitioners claim that the manual is irrelevant because it lacks a legible date is also baseless. The manual explicitly includes a publication reference stating “Publ. 07/01” on page 22 of Exhibit 34.

Finally, Petitioners’ objections do not identify what specific prejudice, confusion, or waste would occur from admitting this evidence. Accordingly, because Exhibit 34 is relevant under FRE 401, admissible under FRE 402, and its probative value is not substantially outweighed under FRE 403, the objection should be overruled.

B. Hearsay

The objections under FRE 801 and 802 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 801-802 exclude hearsay only when an out-of-court statement is offered for the truth of the matter asserted. Exhibit 34 is being offered to show what information Sennheiser published regarding the SK5012 transmitter. This is a permissible, non-hearsay purpose.

Even if the Board considers Exhibit 34 to be hearsay, it qualifies for exceptions at least under FRE 803(17) and FRE 807. FRE 803(17) allows admission of commercial publications that are generally relied upon by the public or by professionals in a related occupation. Instruction manuals for complex electronic equipment like the SK5012 are the kind of publication depended upon by engineers and other professionals. FRE 807 allows for a catch all exception to hearsay. Here, the manual would be considered trustworthy, having been created and distributed by the manufacturer in the ordinary course of its business, and it would be considered more probative of the features and operation than any other secondary summary.

Courts have routinely admitted manufacturer brochures under these exceptions, and thus the objection should be overruled. *See Susemihl v. United S.S. Co. (Bah.)*, 1988 U.S. App. LEXIS 21219 (4th Cir. 1988); *see also United States v. Grossman*, 614 F.2d 295, 297 (1st Cir. 1980).

C. Authenticity

The objection under FRE 901 and 902 should be overruled. These generalized objections lack reasonable particularity and do not allow Patent Owner to meaningfully respond and correct. As explained earlier, FRE 901 requires evidence sufficient to support a finding that the document is what it purports to be, and FRE 902 identifies some examples of documents that are self-authenticating. Exhibit 34 satisfies both of these requirements. Exhibit 34 was downloaded from a manual archive website (<https://www.manualslib.com/manual/1331058/Sennheiser-Sk-5012.html>). A declaration from Patent Owner's counsel attesting to the date and download manner, and identifying the source URLs, is submitted as Exhibit 2029. It is identifiable as a Sennheiser-issued instruction manual for the SK 5012 transmitter. Sennheiser electronic GmbH & Co. is the manufacturer responsible for designing and producing the SK 5012. Exhibit 34 bears the Sennheiser name, logo, and publication details. It contains product specific instructions, technical diagrams, and features-all consistent with a manufacturer issued manual. Additionally, the manual was prepared and distributed by Sennheiser in the ordinary course of business to customers and users of its products. Under FRE 901(a), these characteristics are more than sufficient to support a finding of authenticity. Further, the Exhibit could also be defined as self-authenticating, at least under the definitions of FRE 902(5) and 902(11), due to these instructions for use being maintained by Sennheiser in the ordinary course of business and was distributed broadly to engineers and other professionals. Accordingly, the sworn declaration in combination

with the aforementioned characteristics are sufficient to establish authenticity. Thus, Petitioners' objections under FRE 901 and 902 should be overruled.

V. Conclusion

For all the above, the Board should overrule all of Petitioners' objections set forth in Paper 21.

CERTIFICATE OF SERVICE

The undersigned certifies that on August 29, 2025, a complete and entire copy of the foregoing “PATENT OWNER’S RESPONSE TO PETITIONER’S OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. § 42.64(b)(2)” is being served on the petitioners at the electronic addresses shown below per consent.

jeffrey.plies@dechert.com

greg.chuebon@dechert.com

michael.fisher@dechert.com

megan.gentleman@dechert.com

all-rode-dechert@dechert.com

Dated: August 29, 2025

/Rita C. Chipperson/
Rita C. Chipperson (Reg. No. 54,031)
CHIPPERSON LAW GROUP, P.C
Counsel for Patent Owner