

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.,
MOTOROLA MOBILITY LLC.,
Petitioners,

v.

COLLISION COMMUNICATIONS, INC.,
Patent Owner.

Case No. IPR2025-00285
U.S. Patent No. 6,947,505

**PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. § 42.107(a)**

This Petition is a copycat petition seeking to join the petition in IPR2024-01249. PTAB has already denied that petition in its Decision Denying Institution of *Inter Partes* Review 35 U.S.C. § 314. See *Samsung Electronics America, Inc. et al. v. Collision Communications, Inc.*, IPR2024-01249, Paper 12 (PTAB Feb. 11, 2025). Accordingly, PTAB should deny this identical petition for all of the same reasons it denied the petition in IPR2024-01249.

Dated: March 19, 2025

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. §42.24(d), Patent Owner hereby certifies, in reliance on the word count of the word-processing system (Microsoft Office Word 2010) used to prepare this preliminary response, that the number of words in this paper is 69. This word count excludes the certificate of word count and certificate of service.

Dated: March 19, 2025

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CERTIFICATE OF SERVICE

I certify that a copy of Patent Owner's Preliminary Response is being served by electronic mail on the following counsel of record:

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