

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN ROOT TECHNOLOGY CO., LTD.,

Petitioner,

v.

CHIARO TECHNOLOGY LTD.,

Patent Owner.

Case: IPR2025-00554

U.S. Patent No. 11,806,454 B2

**PATENT OWNER'S MANDATORY NOTICES PURSUANT
TO 37 C.F.R. § 42.8(a)(2)**

Pursuant to 37 C.F.R. § 42.8(a)(2), Patent Owner provides Mandatory Notices in the above-captioned *inter partes* review proceeding.

A. Real Party-In-Interest

In accordance with 37 C.F.R. § 42.8(b)(1), the real parties-in-interest are Willow Blossom Holdco Limited and Willow Innovations, Inc. (collectively “Willow”). Willow Blossom Holdco Limited is a wholly owned subsidiary of Willow Innovations, Inc. In March 2025, Willow acquired the patent at issue in this proceeding from prior patent owner, Chiaro Technology Limited, during the UK equivalent of a bankruptcy proceeding.

B. Notice of Related Matters

In accordance with 37 C.F.R. § 42.8(b)(2), Patent Owner notes that the ’454 patent is the subject of District Court litigation captioned *Shenshen Root Technology Co., Ltd. v. Chiaro Technology, Ltd.*, 2-23-cv-00631 (WDWA). The undersigned is unaware of any other judicial or administrative matter that would affect, or be affected by, a decision in the proceeding.

C. Notice of Lead and Backup Counsel

In accordance with 37 C.F.R. § 42.8(b)(3), Patent Owner’s lead and backup counsel are:

Lead Counsel	Backup Counsel
Heath J. Briggs (Reg. No. 54,919) Greenberg Traurig, LLP 1144 15th St. Suite 3300 Denver, CO 80202 Telephone: 303-685-7418 Facsimile: 720-904-6118 BriggsH@gtlaw.com	Trenton Ward (Reg. No. 59,157) Greenberg Traurig, LLP Terminus 200 3333 Piedmont Road NE, Suite 2500 Atlanta, GA 30305 Telephone: 678-553-2100 Facsimile: 678-553-2212 Trenton.Ward@gtlaw.com
Backup Counsel	Backup Counsel
Benjamin P. Gilford (Reg. No. 72,072) Greenberg Traurig, LLP 90 South 7th Street, Suite 3500 Minneapolis, MN 55402 Telephone: 612.259.9683 Facsimile: 312.873.4694 gilfordb@gtlaw.com	Elana Araj (Reg. No. 75,804) Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 Telephone: 212.801.6566 Facsimile: 212-801-6400 Elana.Araj@gtlaw.com
Backup Counsel	Backup Counsel
Declan Stone-Murphy (Reg. No. 81,789) Greenberg Traurig, LLP One International Place Suite 2000 Boston, MA 02110 Telephone: (617) 310-6000 Facsimile: (617) 310-6001 Declan.StoneMurphy@gtlaw.com	Emma Cohen (<i>Pro Hac Vice</i> forthcoming) Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 Telephone: (212) 801-9350 Facsimile: (212) 801-9351 emma.cohen@gtlaw.com

D. Service Information

In accordance with 37 C.F.R. § 42.8(b)(4), service on Patent Owner may be made by mail or hand delivery to: Greenberg Traurig, LLP, 1144 15th St., Suite 3300, Denver, CO, 80202. Patent Owner also consents to and prefers electronic service by emailing Willow-IPRs@gtlaw.com and counsel of record (shown above).

Dated: May 9, 2025

Respectfully submitted,

/s/ Heath J. Briggs

Heath J. Briggs (Reg. No. 54,919)

GREENBERG TRAURIG, LLP

1144 15th St., Suite 3300

Denver, CO 80202

Telephone: 303-685-7418

Facsimile: 720-904-6118

BriggsH@gtlaw.com

Attorney for Patent Owner

§ 42.6(2) – CERTIFICATE OF SERVICE

In accordance with § 42.6(1), the undersigned certifies that on the 9th day of May 2025, the above **PATENT OWNER’S MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(2)** was served, via electronic mail upon the following counsel for Petitioner:

- Michael Hawkins – hawkins@fr.com
- Craig A. Deutsch – deutsch@fr.com
- Terry Stalford – stalford@fr.com
- Yong Peng – epeng@fr.com
- Ryan Chowdhury – rchowdhury@fr.com
- IPR58498-0005IP1@fr.com

Dated: May 9, 2025

Respectfully submitted,

/s/ Heath J. Briggs
Heath J. Briggs
Reg. No. 54,919
Attorney for Patent Owner