

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AROMA360, LLC,

Petitioner,

v.

AIR ESSSENTIALS, INC.,

Patent Owner.

Case IPR 2025-00707
U.S. Patent No. 10,092,918

PATENT OWNER'S
SUR-REPLY

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit Number	Filing Party	Title
2001	Patent Owner	Transcript for the Deposition of Dr. Christopher White, PhD.
2002	Patent Owner	Declaration of Dr. Gerald Micklow, PhD.
2003	Patent Owner	CV and Qualifications of Dr. Gerald Micklow, PhD
2004	Patent Owner	Certified Translation of CN 20183273U (GAO)
2005	Patent Owner	Cengel Fluid Mechanics
2006	Patent Owner	Munson Fundamentals of Fluid Mechanics 2d Edition
2007	Patent Owner	Heywood Internal Combustion Engine Fundamentals, 2d Edition
2008	Patent Owner	Martinez Liquid Sprays
2009	Patent Owner	Fox Introduction to Fluid Mechanics 4th Edition
2010	Patent Owner	Micklow Primary and Secondary Spray Breakup
2011	Patent Owner	Lefebvre Atomization and Sprays 2d Edition
2012	Patent Owner	Micklow Fuel Spray Modeling
2013	Patent Owner	Smith Scientific Design of Exhaust & Intake Systems
2014	Patent Owner	Lefebvre Atomization and Sprays
2015	Patent Owner	Patent Owner's Supplemental Evidence in Response to Petitioner's Objection to Evidence
2016	Patent Owner	Supplemental Declaration of Dr. Gerard Micklow, PhD.

I. INTRODUCTION

Petitioner has not carried its burden under 35 U.S.C. § 316(e) of proving unpatentability by a preponderance of the evidence on any of the four grounds. Across each ground, Petitioner's Reply relies on shifting structural mappings, after-the-fact expert characterizations, and hindsight-driven combinations to fill gaps in what the prior art actually discloses, rather than identifying any express teaching that cures the deficiencies in the Petition. On the full record, including the testimony of Dr. Micklow ("Micklow") and the deposition admissions of Dr. White ("White"), the references do not teach or suggest U.S. Patent No.10,092,918's (the "'918 Patent") claimed structures and functions, and the challenged claims should not be found unpatentable.

II. MICKLOW'S SUPPLEMENTAL DECLARATION

Petitioner filed an Objection to Evidence [Paper 19], wherein Petitioner objected to Exhibit 2002 under FRE 702. In response, on April 15, 2026 Patent Owner ("PO") served supplemental evidence in response to Petitioner's Objection to Evidence, namely, a Declaration of Micklow, each document of which is attached hereto as Exhibit 2015.

III. GROUND 1 (GOUBET) — RESPONSE TO REPLY

A. Goubet Does Not Disclose a Diffusion Assembly “Disposed Between” an Upper and Lower Chamber

Petitioner’s Reply baselessly misstates PO’s position, counterfactually asserting that the Patent Owner’s Response (the “POR”) relies on Petitioner “supply[ing] missing structure” to arrive at the element of a diffusion assembly “disposed between” an upper and a lower chamber in Goubet. Paper 21, pages 4-5. The POR does not dispute the existence of an upper chamber and a lower chamber in Goubet, instead illustrating that the purported diffusion assembly of Goubet in relation to the upper and lower chambers *per Petitioner’s own labeling* [Paper 10, pages 17-18] does not and cannot satisfy the “disposed between” requirement. Indeed, as labeled by Petitioner, the diffusion assembly of Goubet at no point passes between the upper and lower chambers, and cannot be disposed between the chambers vertically as the assembly vertically encompasses the chambers. Paper 2, Page 63.

Petitioner’s attempt to cure this deficiency by arguing that diffusion assembly 210 of the Patent “extend[s] beyond the upper and lower chambers” [Paper 21, pages 5-6] disregards the importance of the presence of the diffusion assembly *between* the upper and lower chambers. The chambers 112” and 114” of the Patent are horizontally separated by diffusion assembly 210, which therefore rests transverse

to the path of the fluid dispersion to enable deflected off of the bottom chamber en route to the top chamber and subsequent assemblage. *See* Exhibit 1001, Column 11, Lines 1-14.

B. Petitioner’s “Inertial Impaction / Size-Selective Classifier” Theory Does Not Establish Formation of a Fluid Dispersion

The only argument Petitioner presents to support the creation of a fluid dispersion by Goubet depends entirely on the disregarding of Dr. Micklow’s testimony. Petitioner first argues that “Goubet’s express disclosure” leads a POSITA to “break droplets into microdroplets and reduce droplet size.” Paper 21, Page 6. This fails to meet the stipulated definition of a fluid dispersion as which, as Petitioner itself admits later in its argument, requires uniformity. Paper 21, Page 7. While Petitioner attempts to deny this requirement, the Institution Decision notes that “Petitioner presents its initial case based on the *stipulated construction* of ‘fluid dispersion’ as ‘a mixture of operative fluid in air comprising a plurality of *substantially uniform droplets* . . . dispersed *throughout* the air.” Paper 10, Page 16 (emphasis added).

Petitioner’s own citations to White’s arguments fail to discuss a uniform dispersion, only offering “mechanisms that remove coarse droplets from the flow.” Paper 21, Page 7. Finally, without support, Petitioner attempts to fall back on a theory that “[a]dditional enclosures would resolve PO’s alleged problem with

Goubet,” providing no evidence for same beyond a self-referential and conclusory citation to the Petition [Paper 21, Pages 7-8] which does not support that Petitioner’s novel theory of “additional disclosures” would be obvious to one of ordinary skill in the art. Petitioner erroneously cites to pages 60 and 61 of its Petition and Paragraphs 277-280 of White’s declaration. Paper 21, Page 7. PO notes that while these page ranges do not correspond to the argument made, the Petition and White’s declaration **do** conclude elsewhere—without support or reasoning—that “[a] POSITA **would** modify Goubet’s diffuser head to include additional disclosures.” Ex. 1002, Para. 168 (emphasis added). This conclusion alone cannot satisfy Petitioner’s burden.

C. Petitioner’s Lack of Experimental Data Cannot Be Negated by Conclusory Reliance on the Prior Art.

In the absence of experimental data to support White’s assertions, Petitioner attempts to rely on “Goubet’s stated purpose and mechanism” to support its position. Paper 21, Page 8. Petitioner’s gambit fails for two reasons. First, this attempt to rely on the statements of the prior art to prove the function of the prior art beg the question and provide no additional support for Petitioner’s argument. Second, “Goubet’s stated purpose and mechanism,” even if taken as completely accurate and functioning as described, make **no** reference to a plurality of substantially uniform droplets—only **smaller** droplets than those first produced. *See generally*, Exhibit 1016. All Petitioner has to present is the theoretical opinion of its expert which

conflicts with the testimony of Dr. Micklow and should be given no additional weight.

D. Claims 3-4 and 6-8

Because Petitioner has not established the unpatentability of claim 1 and 5 under Ground 1, its attacks on the dependent claims fail for the reasons set out in the POR. Paper 16, Page 8.

IV. GROUND 2 (GOUBET IN VIEW OF KAISER)

Petitioner's Reply does not cure the deficiencies the Board identified in its Institution Decision [Paper 10, Pages 22-23], and on the full record, Kaiser is neither analogous art, nor would a POSITA combine it with Goubet as Petitioner so proposes. Paper 10, Page 23 (“On the current record and in view of our decision to institute based on other grounds, we reach no conclusion as to whether Petitioner has made a sufficient showing that one of ordinary skill in the art would have combined Goubet and Kaiser as proposed”). Ultimately, Petitioner's Reply [Paper 21, Pages 9-12] relies on *Unwired Planet, LLC v. Google Inc.*, 841 F.3d 995 (Fed. Cir 2016) that glaringly shows Kaiser is not from the same field of endeavor as the claimed invention, distorts problems to which the ‘918 Patent relates, and entirely overlooks an explicit showing of how a POSITA would consider Kaiser in light of the invention at hand. Accordingly, on the full record, Petitioner has not carried its burden under 35 U.S.C. § 316(e) to demonstrate that Kaiser is analogous art or that

a POSITA would have combined Goubet and Kaiser as proposed, and the Board should reject Ground 2 in its Final Written Decision.

A. Petitioner's Field-of-Endeavor Theory Entirely Mischaracterizes the *Unwired Planet* Case with Respect to the Purposes of the Claimed Invention

As an initial point, Paper 16 identifies that Kaiser “operates in a fundamentally different atomization regime from the fluid-flow-driven mechanisms of the ’918 Patent, one based on electrosprays, in which charged droplets are formed from capillaries and dispersed through Coulombic repulsion.” Paper 16, Page 11 (citing Ex. 2002 ¶¶ 20).

As such, when considering *Unwired Planet*, 841 F.3d at 1001, although “[a] field of endeavor is not limited to the specific point of novelty or a particular focus within a given field” as Petitioner states, at the same time, Petitioner entirely overlooks the unquestionably identical fields of endeavors at issue within the referenced case. *See Unwired Planet*, 841 F.3d at 1001 (finding the patent as teaching methods for ordering and displaying information, such as within menus, on graphical user interfaces where the prior art reference generally dealt with graphical user interface design and included a chapter devoted to menu design with specific suggestions for how to order menu items and an example related to the problem the patent addressed). The Court found that the patent and reference overlapped not only because reference had directly relevant information on graphical user interfaces,

including an example, which is what the patent taught, *but also because “a skilled artisan ... would reasonably look to [the prior art reference], which teaches solutions to the same problem.”* *Id* (emphasis added).

Therefore, Petitioner's proposed framing of what the '918 Patent relates to, “the field of dispersion of various fluids including, but not limited to, fragrant oils... into a generally enclosed airspace” [Paper 21, Page 17 (citing Ex. 1001, 1:7:11)] attempts to sweep in any technology that involves liquid/fluid entering a confined space. Under that conception, fire suppression, agricultural pesticide application, fuel injection, and ink-jet printing would all share a field of endeavor with the '094 Patent. However, none of those technologies, nor Kaiser's high-voltage electrospray combustion technology, shared the kind of concrete technical overlap *Unwired Planet* requires to support an analogous field of endeavor finding. As such, Petitioner's argument should not be given weight.

B. Kaiser is Not Reasonably Pertinent to the Problem Faced by the Inventor of the '918 Patent and the *Donner Technology, LLC* Case Petitioner Cites to Confirms this

Petitioner's reasonable-pertinence argument fares no better. Petitioner cites *Donner* for the rule that a reference is analogous art if it “is reasonably pertinent to one of the problems purportedly solved by the '918 Patent....” Paper 21, Page 10 (citing *Donner Tech., LLC v. Pro Stage Gear, LLC*, 979 F.3d 1353, 1359 (Fed. Cir. 2020)). However, Petitioner ignores the core holding of the case. See *Donner*, 979

F.3d at 1360-61 (reversing the Board's analogous-art determination because the reasonable-pertinence inquiry “must be carried out from the vantage point of a [POSITA] who is considering turning to the teachings of references outside her field of endeavor,” and the relevant question is whether a POSITA “would reasonably have consulted” the reference in solving the relevant problem).

Petitioner's evidence on this point is exactly what *Donner* forecloses. Petitioner relies on Dr. White's general statement that uniform droplet size correlates with uniform evaporation and that Kaiser can be consulted to modify Goubet's existing structure for producing more uniform droplets. Paper 21, Page 110 (citing Ex. 1014, 43; Paper 2, Pages 47-48; Ex. 1002 ¶ 166). ***Again, at no point does Petitioner explain if a POSTIA would have reasonably consulted the reference in solving the relevant problem, Petitioner only argues that it could have been done.*** See MPEP § 2145(X)(A) (forbidding hindsight-driven reconstruction of references to render claims obvious).

Petitioner then relies on a minuscule, irrelevant portion from Dr. Micklow's deposition on this point where he stated, in the context of describing how the human nose detects scent, that “in combustion, you want [particles] to be small, so you get a rapid burn.” Paper 21, Page 11 (citing Ex. 1046, 21:16-19). As should be apparent, neither Petitioner's reliance on Dr. White's declaration, nor Dr. Micklow's deposition speaks to the controlling *Donner* question: whether a POSITA solving

problems set forth in the '918 Patent would have consulted Kaiser, a paper on high-voltage electrospray injection for catalytic combustion in mesoscale power systems. But, within the Deposition of Dr. Micklow, **when discussing Kaiser**, this question is answered, which Petitioner conveniently ignores.

Indeed, Dr. Micklow, an engineer with fifty years of experience in fluid dynamics and atomization, testified that he has “never seen [electrospray] used” in spray atomization “in [his] 50 years as an engineer” “because it's not practical.” Ex. 1046, 236:9-13. He testified that, when considering Kaiser, “it is just not the type of system we’re modeling here. This cannot be something that could be designed, developed and proceeded and sold,” and “a mechanical engineer or somebody that did fluid flow wouldn't think about [Kaiser]. It's just — it's just not there.” Ex. 1046, 237:21-238:12. And he testified that electrospray “would not be a choice of a mechanical engineer designing a system like this.” Ex. 1046, 240:3-7. That is the precise testimony *Donner* identifies as dispositive: a POSITA's vantage point on whether to consult the reference at all. See *Donner*, 979 F.3d at 1361 (“The relevant question is whether a [POSITA] 'would reasonably have consulted' the reference in solving the relevant problem.”).

Accordingly, Petitioner has not established that a POSITA considering the problems purportedly solved by the '918 Patent would have reasonably consulted Kaiser, and Kaiser is therefore not reasonably pertinent to the problems with which

the ‘918 Patent inventor was involved. To this end, a POSITA would not have a motivation to combine Goubet and Kaiser. As such, the relevant claim should not be found unpatentable in light of Goubet and Kaiser.

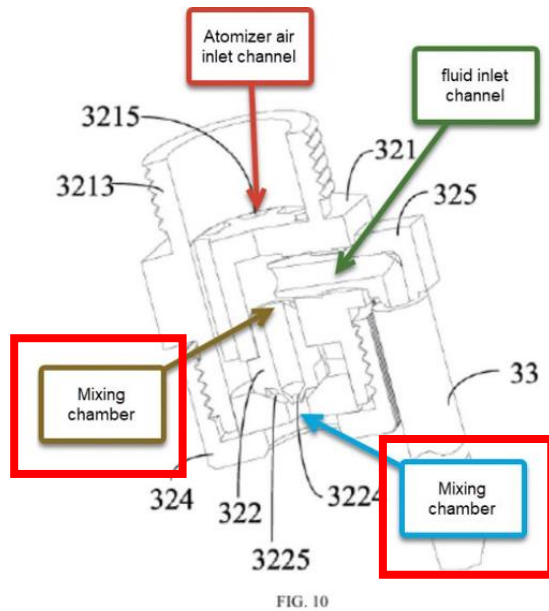
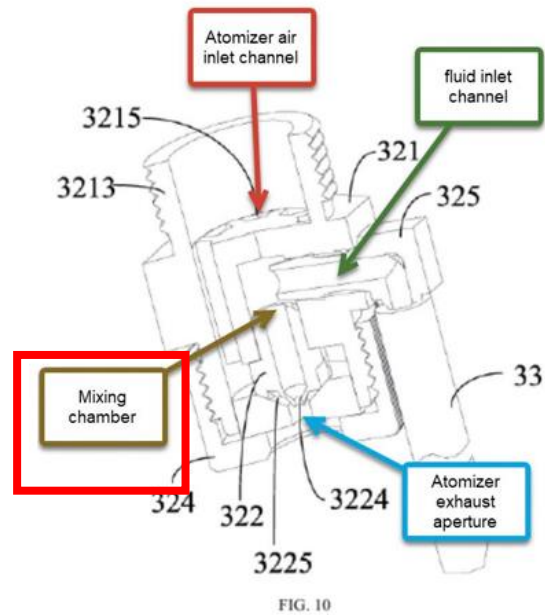
C. Claims 8, 9, and 11

Because Petitioner has not established the unpatentability of claim 1 and 5 under Ground 2, the dependent claims fail for the reasons set out in the POR. Paper 16, Page 13.

V. GROUND 3 (GAO-2) — RESPONSE TO REPLY

A. Claim 1 – The Mixing Chamber

Gao-2 should not be found to render the ‘918 Patent obvious. Petitioner undeniably stated that Gao-2 contained a “mixing chamber” as the “***chamber within core base 322***” [Paper 2, Pages 59-60], as did its Expert. Ex. 1002, ¶¶ 185, 186. Both it and its expert went so far as to indicate, the “mixing chamber” within the core base 322 of Gao-2 as follows:



Paper 1, Page 56; Paper 2, Page 86 (annotated).

It is clear that Petitioner now seeks to alter its proposition in that the “mixing chamber [of Gao-2]... is something else because, clearly: Gao-2 does not comprise a mixing chamber, nor any suggestion of one. Regardless, Petitioner provides the following annotated image:

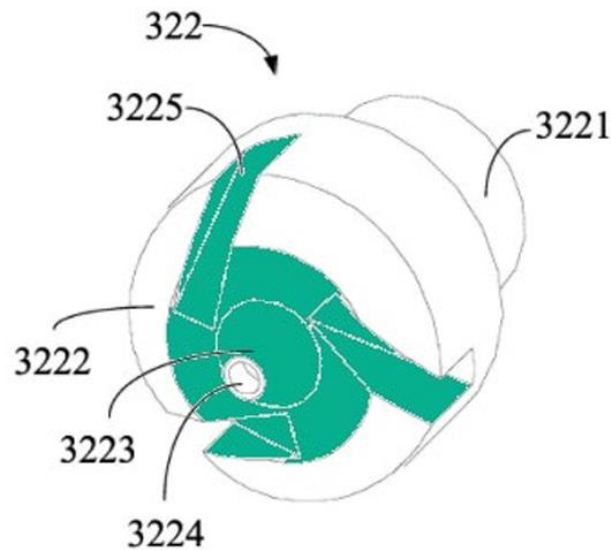


FIG. 9

Paper 21, 14.

In so doing, Petitioner makes the argument that Gao-2's "mixing chamber" is not the chamber of core base 322 as previously stated and indicated in drawings, but rather "is located at the tip of the atomization rotating core 322 and is formed by the 'plurality of the guide grooves surrounding the outlet of the liquid suction hole' (e.g., the chamber within rotating core 322 consisting of the space between the surface of guide grooves and the surface of cap 323 proximate the rotating core)" *Id.* (citing Ex. 1042 ¶12). Despite describing the mixing chamber as being located at "the tip," Petitioner conveniently fails to highlight the tip (or the collar around 3224) of the core base 22 in the above annotated Figure.

Nothing prevented Petitioner from making its current argument before (nor forced it to label both ends of the rotating core 322 as the mixing chamber as

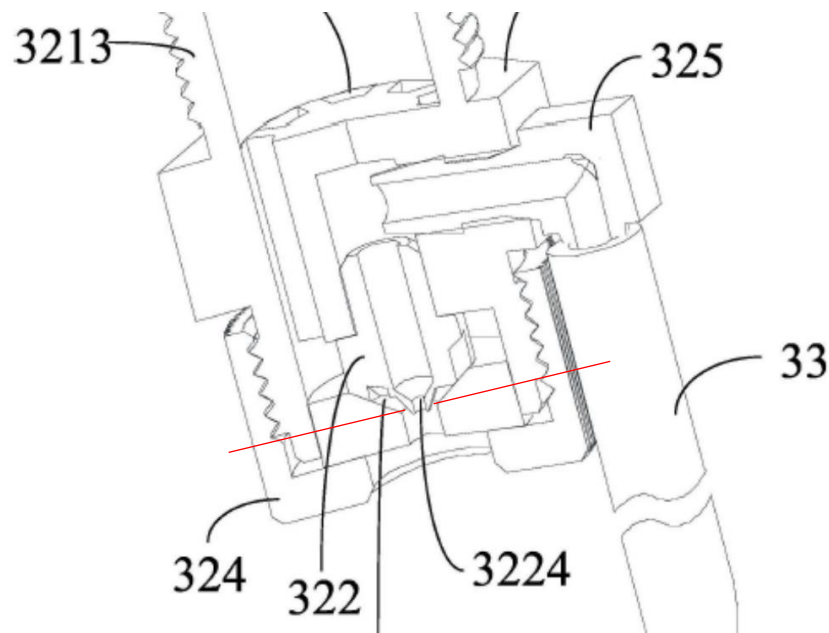
indicated in the annotated Figure above), but it grasps at straws in defending the proposition by introducing a new perspective in that “[b]ecause guide grooves 3225 are defined within atomization rotating core 322 and such that they ‘surround’ suction hole 3224, a POSITA would understand Gao-2 to disclose a chamber within rotating core 322 in which air and oil are mixed before discharge – i.e., a ‘mixing chamber.’” *Id.* Further, its expert does not correct himself in his supplemental declaration, nor support this altered view. Ex. 1047.

Either way, what Petitioner attempts to call a mixing chamber within Gao-2 is contradicted by a plain reading of the reference and Dr. Micklow’s opinion. Ex. 2016.

The reference itself is unambiguous: “[t]he essential oil then mixes with the airflow and is atomized at the outlet of the liquid suction hole 3224, before being sprayed out from the spray outlet 3231.” Ex. 1042, ¶ 0036. Gao-2 does not state that essential oil mixes with airflow within guide grooves 3225, and Gao-2 does not describe guide grooves 3225 (nor any other structure) as a chamber under either party’s proposed construction. Ex. 1051, B. To the contrary, immediately surrounding the liquid suction hole 3224 is the spray outlet 3231.

Dr. Micklow confirm’ s this reading, and shows that Gao-2 does not teach nor suggest a mixing chamber as described in the claims of the ‘918 Patent. Essential oil is drawn to liquid suction hole 3224 by negative pressure. Ex. 1042, ¶ 0036. Air

travels separately along guide grooves 3225, which are surface channels formed about the exterior of the atomization rotating core 322. The two fluids never coexist within the grooves; they meet only at the outlet of liquid suction hole 3224, where each exits its respective passage. Ex. 2016, ¶¶ 5-9. That is precisely the location Gao-2 identifies. Ex. 1042, ¶ 0036. Guide grooves 3225 are the path air takes to reach the mixing point, not the place where mixing occurs. *Id.*, ¶¶ 5-12. To this end, within Figure 10, the hole 3224 is disposed lower than any structure Petitioner attempts to call Gao-2’s mixing chamber, foreclosing Gao-2 from teaching one as claimed or as Petitioner so asserts:



Ultimately, Petitioner's revised mapping would convert any air flow channel terminating where mixing occurs into a “mixing chamber,” a construction neither party advanced in Ex. 1051.

As Gao-2 should not be found to have nor suggest a mixing chamber, it should also not be found to suggest a mixing chamber.

B. Claim 1 – The Fluid Dispersion

Claim 1 recites that “... air and the operative fluid mix together in said mixing chamber to form the fluid dispersion.” Ex. 1001, Claim 1. The parties have stipulated that “fluid dispersion” means a “mixture of an operative fluid in air comprising a plurality of substantially uniform droplets” Ex. 1051, Ex. A. Reading those two together, Claim 1 unquestionably requires that the mixing of air and an operative fluid *inside the mixing chamber produce a mixture comprising substantially uniform droplets.*

PO maintains that Gao-2 does not contain a mixing chamber, nor suggest one as required by the ‘918 patent’s claim. Nevertheless, Petitioner identifies the space between guide grooves 3225 and cap 323 within atomization rotating core 322 as the claimed mixing chamber. Paper 21, 14. Assuming this is a mixing chamber per the ‘918 Patent, Gao-2 discloses that what is sprayed out of spray outlet 3231 is a mixture of “coarse fragrant mist” and “fine fragrant mist,” and that the coarse mist falls back into the essential oil bottle 2 under gravity, “while only the fine fragrant mist disperses outward.” Ex. 1042, ¶ 30.

As such, at best, what is formed within Petitioner's alleged mixing chamber is a non-uniform mixture of coarse and fine droplets, which only becomes selectively

segregated by gravity or other structures after exiting spray outlet 3231. The formation of any substantially uniform droplet population is linked to that downstream gravity-based segregation, not to anything that happens inside the alleged chamber.

Ultimately, the claimed structure forms substantially uniform droplets within the mixing chamber. Granted, even if those substantially uniform droplets are later refined into even more uniform droplets, the claim and stipulated language clearly requires at least substantially uniform droplets to be ***formed within the mixing chamber***. As such, the elements as arranged in the claim do not exist within the structure Petitioner has identified as Gao-2's mixing chamber, and Gao-2 should not be found to render obvious the '918 Patent.

C. Claims 3-8

PO maintains the arguments set forth in the Response with respect to Claims 3-8. Paper 16, 14-20. That said, related to Claim 7, for reasons discussed above and in the POR, Gao-2 should not be found to anticipate it.

VI. GROUND 4

Petitioner's Reply regarding Ground 4 misses the core of PO's Response and should itself be disregarded. PO's contention is that "[e]ven if a POSITA had motivation to combine the two references, ***said combination would still lack*** the dispersion of uniform fluid droplets required by the '918 Patent." Paper 16, Page 21.

As described above, either reference alone or in combination with one another does not provide for the formation of a fluid dispersion within a “mixing chamber.” Again, ultimately, the claimed structure forms substantially uniform droplets within the mixing chamber. Granted, even if those substantially uniform droplets are later refined into even more uniform droplets, the claim and stipulated language clearly requires at least substantially uniform droplets to be formed within the mixing chamber. Petitioner does not comment on this point, but only attempts to shift the argument to uniform droplet formation *outside the mixing chamber*. Therefore, either reference, alone or in combination with one another does not provide for the formation of a fluid dispersion within a “mixing chamber.” As petitioner states “Ground 4 does not rely on Goubet to supply a ‘mixing chamber’ or replace Gao-2’s atomization mechanism[,]” no further analysis is needed on the point, and as should be readily apparent, the combination of Gao-2 and Goubet does not render the challenged claims obvious.

A. Claims 3-8

PO maintains the arguments set forth in the Response with respect to Claims 3-8. Paper 16, 20-21. That said, related to Claim 7, for reasons discussed above and in the POR, Gao-2 should not be found to anticipate it.

VII. CONCLUSION

For the reasons set forth above and in the PO Response, Petitioner has not carried its burden under 35 U.S.C. § 316(e) of proving by a preponderance of the evidence that the challenged claims of the '918 Patent are unpatentable on any of the four grounds. Petitioner's Reply does not cure the deficiencies in the Petition's reliance on Goubet, Goubet in view of Kaiser, Gao-2, or Gao-2 in view of Goubet, and the testimony of Micklow and the admissions of White confirm those deficiencies on the full record. The challenged claims should be confirmed.

Dated: May 15, 2026

Respectfully submitted,

/W. John Eagan/

W. John Eagan

Lead Counsel

johneagan@malloylaw.com

PTO Registration No.: 80,479

Peter A. Matos

pmatos@malloylaw.com

PTO Registration No.: 37,884

Victor A. Bruzos

vbruzos@malloylaw.com

PTO Registration No.: 82,370

Rafay M. Asrar

rasrar@malloylaw.com

PTO Registration No.: 76,683

MALLOY & MALLOY, P.L.

2800 SW 3rd Ave

Historic Coral Way

Miami, Florida 33129

Telephone: 305-858-8000

Counsel for Patent Owner

CERTIFICATE OF COMPLIANCE WITH WORD COUNT LIMIT

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that this Patent Owner's Sur-Reply (the "POSR") contains **3,526** words, excluding the parts of the POSR exempted by 37 C.F.R. § 42.24(c), as determined by the word count function of the word-processing program used to prepare this document.

Dated: May 15, 2026

Respectfully submitted,

/W. John Eagan/

W. John Eagan

Lead Counsel

johneagan@malloylaw.com

PTO Registration No.: 80,479

Peter A. Matos

pmatos@malloylaw.com

PTO Registration No.: 37,884

Victor A. Bruzos

vbruzos@malloylaw.com

PTO Registration No.: 82,370

Rafay M. Asrar

rasrar@malloylaw.com

PTO Registration No.: 76,683

MALLOY & MALLOY, P.L.

2800 SW 3rd Ave

Historic Coral Way

Miami, Florida 33129

Telephone: 305-858-8000

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Patent Owner's Sur-Reply (the "POSR") has been served in its entirety on May 15, 2026, by causing the POSR and accompany documents (if any) to be electronically mailed to the following attorneys of record for the Petitioner:

James P. Murphy
jpmurphy@polsinelli.com
William A. Di Bianca
bdibianca@polsinelli.com
Jordan T. Riviello
jriviello@polsinelli.com
Joshua L. Rayes
jrayes@polsinelli.com

Dated: May 15, 2026

Respectfully submitted,

/W. John Eagan/

W. John Eagan
Lead Counsel
johneagan@malloylaw.com
PTO Registration No.: 80,479
Peter A. Matos
pmatos@malloylaw.com
PTO Registration No.: 37,884
Victor A. Bruzos
vbruzos@malloylaw.com
PTO Registration No.: 82,370
Rafay M. Asrar
rasrar@malloylaw.com
PTO Registration No.: 76,683
MALLOY & MALLOY, P.L.
2800 SW 3rd Ave
Historic Coral Way
Miami, Florida 33129
Telephone: 305-858-8000

Counsel for Patent Owner