

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HENRI DAUSSI, LLC,  
Petitioner,

v.

ECNA, LLC,  
Patent Owner.

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IPR2025-00807  
Patent 9,398,791

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PATENT OWNER'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
PATENT OWNER'S PRELIMINARY RESPONSE

UNDER 37 C.F.R. § 42.5(c)(2)

Pursuant to 37 C.F.R. § 42.5(c)(2), Patent Owner respectfully moves for a 60-day extension of time to file Patent Owner's Preliminary Response in the above-captioned inter partes review. Good cause exists to grant this request for the following reasons:

- I. No Opposition from Petitioner:** Counsel for Petitioner has been consulted and does not oppose the requested extension.
- II. Change in Lead Counsel and Relocation:** Keith J. Grady, Lead counsel for Patent Owner in pending and related district court litigation *Christopher Designs v. Henri Daussi, LLC*, Case No. 24-cv-03186, recently transitioned to a new law firm and has relocated across the country. Keith J. Grady is to be admitted pro hac vice in the above-captioned inter partes review. This change has necessitated additional time to ensure continuity and coordination in the representation of Patent Owner, including access to case files and preparation of Patent Owner's Preliminary Response.
- III. Need for Additional Time to Address Petitioner's Expert Report:** Petitioner submitted a lengthy expert declaration in support of its Petition. Patent Owner requires additional time to evaluate and respond to the report, including consulting with its own expert in preparation of the Preliminary Response.
- IV. Ongoing Settlement Discussions:** The parties are currently engaged in active settlement and discussions, as well as possible mediation discussions, that could resolve the dispute without the need for further proceedings. Allowing additional time may facilitate a resolution and conserve Board and party resources.

Patent Owner respectfully submits that the requested extension is reasonable, not for purposes of delay, and is supported by good cause for the reasons indicated above. The extension will further promote judicial efficiency in light of the ongoing settlement efforts.

Relief Requested: Patent Owner respectfully requests that the deadline to file Patent Owner's Preliminary Response be extended by 60 days, up to and including September 15, 2025.

Respectfully submitted,

Date: June 26, 2025

/ Nathan C. Lovette /  
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*Counsel for Patent Owner ECNA,  
LLC*

**CERTIFICATION OF CONFERENCE**

Counsel for Patent Owner certifies that it has conferred with counsel for Petitioner,  
Armin Ghiam, who indicated that Petitioner does not oppose this motion.

Date: June 26, 2025

/ Nathan C. Lovette /  
Nathan C. Lovette (Reg. No. 78,666)

*Counsel for Patent Owner ECNA,  
LLC*

**CERTIFICATION OF SERVICE**

Counsel for Patent Owner certifies the foregoing Motion for Extension of Time to File Patent Owner's Preliminary Response was served on Petitioner's counsel of record by electronic notification through P-TACTS and email to:

Armin Ghiam (aghiam@Hunton.com)

Date: June 26, 2025

/ Nathan C. Lovette /  
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