

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HENRI DAUSSI, LLC,
Petitioner,

v.

ECNA, LLC,
Patent Owner.

IPR2025-00807
Patent 9,398,791

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 30-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. Ongoing Settlement Efforts: The parties have been diligently engaged in active settlement discussions and have concluded mediation proceedings on September 4, 2025. As a result of the mediation, the parties have an agreement in principle on settlement terms and are currently in the process of finalizing and executing a written settlement agreement. It has taken more time than anticipated to finalize the written settlement agreement. Therefore, an additional extension of time is requested.

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. Granting the extension will promote judicial efficiency by allowing the parties sufficient time to complete and formalize the settlement agreement, which may render further proceedings unnecessary.

Relief Requested: Patent Owner respectfully requests that the deadline to file Patent Owner's Preliminary Response be extended by 31 days, up to and including November 15, 2025.

Respectfully submitted,

Date: October 13, 2025

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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: October 13, 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: October 13, 2025

/ Nathan C. Lovette /
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