

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.

Petitioner,

v.

STERLING COMPUTERS CORPORATION

Patent Owner.

Case IPR2025-01248

U.S. Patent No. 7,716,217

**PATENT OWNER'S OPPOSITION TO
PETITIONER'S CONDITIONAL MOTION FOR JOINDER
UNDER 35 U.S.C. 315(C) AND 37 C.F.R. 42.22 AND 42.122(B)**

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I. INTRODUCTION

Sterling Computers Corporation (“Patent Owner”) submits this Opposition to the Conditional Motion for Joinder filed by Meta Platforms, Inc. (“Petitioner” or “Meta”), in which Meta seeks to join in the *inter partes* review (“IPR”) proceedings filed by X Corp. challenging U.S. Patent No. 7,716,217 (“the ‘217 Patent”). Meta’s new Petition is a “copycat” petition, asserting the same grounds of unpatentability as those asserted by X Corp. in its IPR Petition. Patent Owner respectfully requests the Board exercise its discretion to deny Petitioner’s Conditional Motion for Joinder.

Petitioner’s motion should be denied because Meta already had one “bite at the apple” in connection with its existing Petition (IPR2025-00430), which also challenges the same claims of the ‘217 Patent. When Meta filed its first IPR Petition in January, X Corp. had already filed its Petition, and Meta admittedly knew about X Corp.’s Petition. Therefore, Meta could have raised the grounds that X Corp. raised in its Petition (e.g., the Kircher-Krug combination) in the first IPR that Meta filed in January. Meta elected not to do so. Instead, Meta waited to see whether the Board would institute proceedings in X Corp.’s IPR. It was only **after** the Board instituted proceedings in the X Corp. IPR (and only after Meta was statutorily barred from otherwise bringing a new IPR Petition) that Meta filed an IPR Petition asserting the Kircher-Krug combination. Were the Board to grant Meta’s motion for joinder now, the Board would be rewarding Meta’s undue delay and gamesmanship.

II. BACKGROUND

On January 31, 2025, Meta filed its first IPR Petition, in which it sought to invalidate certain claims of the '217 Patent on the basis of grounds that included (1) Dumais; (2) Rose; and (3) Rose in combination with Bieganski. *See* Petition, *Meta v. Sterling*, IPR20205-430. Preliminary briefing on that IPR Petition has been completed, but the Board has not yet issued an institution decision.

Prior to Meta's filing of its first IPR Petition in January 2025, X Corp. filed an IPR Petition (in December 2024) seeking to invalidate certain claims of the '217 Patent on the basis of grounds that included (1) Dumais; (2) Dumais in combination with Marston; (3) the combination of Kircher and Krug; and (4) the combination of Kircher, Krug, and Marston. *See* Petition, *X Corp. v. Sterling*, IPR20205-00299. The only ground that overlaps as between the Meta and X Corp. IPRs is the ground challenging the claims based upon the Dumais reference.

When Meta filed its first IPR Petition, Meta knew that X Corp. had already filed its Petition. *See* Petition, *Meta v. Sterling*, IPR2025-00430, at 7 (acknowledging that "X Corp. filed an IPR petition challenging claims of Marston on December 12, 2024...."). Therefore, when Meta filed its IPR Petition, Meta knew about the Kircher and Krug references in the Petition filed by X Corp., and Meta could have asserted Kircher and Krug as grounds for invalidity in Meta's first IPR Petition. Meta elected not to do so. Instead, Meta waited to see whether the X

Corp. Petition would be successful – i.e., whether the Board would institute proceedings in the X Corp. proceedings. It was only after the Board instituted proceedings with X Corp. that Meta filed its copycat Petition, seeking (for the first time) to challenge the claims based upon the Kircher and Krug references.

Patent Owner first asserted Meta's infringement of the '217 Patent on May 22, 2024. Thus, the one-year time bar was effective on May 22, 2025. Meta's copycat Petition was not filed until July 10, 2025. Therefore, but-for the joinder statute, Meta's copycat Petition would be statutorily time barred.

III. ARGUMENT

The statute on joinder states that “[i]f the Director institutes an inter partes review, the Director, **in his or her discretion**, may join as a party to that inter partes review any person who properly files a petition under section 311 that the Director ... determines **warrants the institution** of an inter partes review under section 314.” 35 U.S.C. § 315(c) (emphasis added). Thus, Section 315(c) requires “two different decisions,” first “whether the joinder applicant’s petition for IPR ‘warrants’ institution under § 314,” and then whether to “exercise ... discretion to decide whether to ‘join as a party’ the joinder applicant.” *Facebook, Inc. v. Windy City Innov., LLC*, 973 F.3d 1321, 1332 (Fed. Cir. 2020).

Patent Owner respectfully submits that, with respect to both of these questions, Petitioner's motion for joinder should be denied. **First**, Meta's copycat

Petition does not “warrant” institution under the *General Plastic* factors. **Second**, even if institution were “warranted,” there are ample reasons – including factors of fairness (e.g., Meta’s gamesmanship and undue delay) and lack of any prejudice to Meta – for the Board to exercise its discretion to deny joinder here.

A. The Board Should Deny Meta’s Motion for Joinder Because Meta’s Second, Copycat Petition Does Not “Warrant” Institution.

The first decision under Section 315(c) is whether Meta’s petition for IPR “warrants” institution under § 314. The *General Plastic* decision sets forth a number of factors to be considered in evaluating whether to exercise discretion, under 35 U.S.C. § 314(a), to deny a petition that challenges a patent that was previously challenged before the Board. Here, Meta’s Petition for IPR does not “warrant” institution because the *General Plastic* factors weigh against institution.

1. Standard of Review.

The Board’s decision in *General Plastic* articulates a non-exhaustive list of factors to be considered in evaluating whether to exercise discretion, under 35 U.S.C. § 314(a), to deny a petition that challenges a patent that was previously challenged before the Board. These factors are:

1. whether the same petitioner previously filed a petition directed to the same claims of the same patent;
2. whether at the time of filing of the first petition the petitioner knew of the prior art asserted in the second petition or should have known of it;

3. whether at the time of filing of the second petition the petitioner already received the patent owner's preliminary response to the first petition or received the Board's decision on whether to institute review in the first petition;
4. the length of time that elapsed between the time the petitioner learned of the prior art asserted in the second petition and the filing of the second petition;
5. whether the petitioner provides adequate explanation for the time elapsed between the filings of multiple petitions directed to the same claims of the same patent;
6. the finite resources of the Board; and
7. the requirement under 35 U.S.C. § 316(a)(11) to issue a final determination not later than 1 year after the date on which the Director notices institution of review.

General Plastic Industrial Co., Ltd. v. Canon Kabushiki Kaisha, IPR2016-01357, Paper 19, at 9-10 (PTAB Sept. 6, 2017) (“*General Plastic*”).

2. Meta's Copycat Petition Does Not “Warrant” Institution.

Applying the *General Plastic* factors to the case at hand, Meta's copycat Petition does not “warrant[]” institution under Section 314. Meta's copycat Petition is undeniably the **second** petition that Meta has filed challenging the '217 Patent. Patent Owner respectfully requests that the Board exercise its discretion to deny Meta's copycat Petition and deny joinder (1) because of Meta's repeated challenge; (2) because, since Meta filed its first petition, Meta has had the benefit of Patent Owner's filings in prior IPR with Meta and in the IPR with X Corp.; and (3) Meta has failed to explain why Meta didn't assert these grounds in its first petition. *See*

General Plastic, at 9-10; *Apple Inc. v. Uniloc 2017 LLC*, No. IPR2020-00854, 2020 WL 6323533, at *3 (P.T.A.B. Oct. 28, 2020) (finding institution not “warranted” and denying motion for joinder under similar circumstances).

First, the same petitioner (Meta) previously filed a petition (IPR2025-00430) directed to the same claims (1-3, 5-9, 13-15, 18-19, 22) of the same patent (the ‘217 Patent). This factor weighs in favor of denying institution of Meta’s copycat Petition. *See General Plastic*, at 9-10; *Apple Inc. v. Uniloc 2017 LLC*, 2020 WL 6323533, at *3 (concluding that first factor weighs in favor of denial, even when the petition filed is a follow-on petition and Petitioner is not seeking an active role in ongoing IPR).

Second, Meta admits it was aware of X Corp.’s Petition when Meta filed its first IPR Petition. Therefore, Meta knew of the prior art asserted in the X Corp. Petition (and Meta’s copycat Petition here) at the time Meta filed its first IPR Petition. This factor weighs in favor of denying institution. *General Plastic*, at 9-10.

Third, when Meta filed its copycat Petition, Meta had already received (1) Patent Owner’s preliminary response to Meta’s first petition and (2) the Board’s institution decision in the X Corp. IPR proceeding. This factor weighs in favor of denying institution of Meta’s copycat Petition. *See General Plastic*, at 9-10; *cf. Apple Inc. v. Uniloc 2017 LLC*, 2020 WL 6323533, at *4 (finding that third factor weighs in favor of denying institution where Petitioner filed its copycat Petition only after receiving Board decisions).

Fourth, Meta learned of the Kircher, Krug, and Marston prior art references asserted in X Corp.'s Petition (and Meta's copycat Petition) at least as early as January 2025. Nevertheless, Meta waited until July 2025 to file a Petition asserting those prior art references. Meta's undue delay is another factor weighing in favor of denying institution of Meta's copycat Petition. *See General Plastic*, at 9-10.

Fifth, Meta's motion for joinder provides zero explanation of "the time elapsed between the filings of multiple petitions directed to the same claims of the same patent" – i.e., there is no explanation of why Meta waited so many months to assert these prior art references. For example, Meta provides no explanation of why it did not include the prior art references in its own, first IPR Petition filed in January. *See General Plastic*, at 9-10; *Apple Inc. v. Uniloc 2017 LLC*, 2020 WL 6323533, at *5 (Petitioner's "lack of explanation" weighs in favor of denying institution).

Sixth, the finite resources of the Board is another factor weighing in favor of denying institution of Meta's copycat Petition: Meta's copycat Petition risks taking up additional Board resources. Although Meta has agreed to an understudy role, there are circumstances in which Meta's copycat Petition would prolong the Board's consideration of challenges to the '217 Patent.¹ This factor weighs in favor of

¹ If (1) institution of Meta's first Petition were denied (i.e., the "condition" upon which Meta's motion is based); (2) the Board grants Meta's motion to join X Corp.'s IPR; and (3) X Corp. exits the IPR proceedings (e.g., if X Corp. settles), then – instead of Meta returning to the District Court proceedings – Meta would continue (and prolong) the proceedings in IPR2025-00299.

denying institution of Meta's copycat Petition. *See General Plastic*, at 9-10; *Apple Inc. v. Uniloc 2017 LLC*, 2020 WL 6323533, at *5 (concluding that this sixth factor weighs in favor of denying institution because, if the other Petitioner were to settle, then the copycat Petitioner "would stand in to continue a proceeding that would otherwise be terminated," requiring resources in continuing the proceeding).

The seventh factor relates to the requirement that the Board issue a final determination not later than one year after the date on which the Director notices institution of review. Here, if the contingencies stated above (*see supra* at n. 1) come to pass, such that Meta is no longer in an understudy role in IPR2025-00299, the participation of Meta in the IPR could prolong the Board's ability to issue a final determination. This factor weighs in favor of denying institution.

Because every one of the *General Plastic* factors weighs in favor of denying institution of Meta's copycat Petition, Patent Owner respectfully requests the Board exercise its discretion to (1) deny institution of Meta's copycat Petition under 35 U.S.C. § 314(a); and (2) because Meta's copycat Petition does not "warrant" institution, deny Meta's motion for joinder under 35 U.S.C. § 315(c). *See Apple Inc. v. Uniloc 2017 LLC*, 2020 WL 6323533, at *5 (exercising discretion under 35 U.S.C. § 314(a) to deny institution where the majority of the *General Plastic* factors weigh in favor of denying institution, and, as a result, denying motion for joinder).

B. The Board Should Exercise Its Discretion to Deny Meta's Motion for Joinder Because "Fairness" Does Not Require Joinder, and Meta Will Suffer No "Prejudice" from Denial of Its Motion.

As set forth above, Meta's motion for joinder should be denied because Meta's copycat Petition does not "warrant" institution. 35 U.S.C. § 315(c). Even if Meta's copycat Petition did "warrant" institution, however, Meta's motion for joinder still should be denied because the discretionary factors that the Board considers in deciding whether to join Meta as a party to X Corp.'s IPR do not weigh in favor of joinder. First, principles of "fairness" do not "require" joinder here. This is because Meta has already had its "bite at the apple" in connection with its first Petition. Moreover, it would be unfair to Patent Owner to permit Meta to join the X Corp. IPR because Meta would not be held to the same estoppel rules as Meta would have been held to if Meta brought the IPR in the first place. Second, joinder is not required here "to avoid undue prejudice," because Meta had an opportunity to assert these prior art references in its first Petition but elected not to do so. Instead, Meta inexplicably waited over six months to assert the prior art references in this copycat Petition. Meta should not be rewarded for its undue delay.

1. Standard of Review.

The decision as to whether to permit joinder is discretionary. 35 U.S.C. § 315(c). The Board has repeatedly explained that it "will exercise this discretion only in limited circumstances—namely, where fairness requires it and to avoid

undue prejudice to a party.” *Proppant Express Invs., LLC v. Oren Techs., LLC*, No. IPR2018-00914, 2019 WL 1283948, at *2 (P.T.A.B. Mar. 13, 2019) (emphasis added); accord *Consolidated Trial Practice Guide*, at 75-76 (same).

“Circumstances leading to this narrow exercise of [the Board’s] discretion may include, for example, actions taken by a patent owner in a co-pending litigation such as the late addition of newly asserted claims.” *Proppant Express v. Oren*, 2019 WL 1283948, at *2. “[T]he Board does not generally expect fairness and prejudice concerns to be implicated by, for example, the mistakes or omissions of a petitioner.” *Id.*

Although the Board has “discretion to grant joinder ... even after the [one year] time limitation,” “the existence of a time bar is one of several factors that may be considered when exercising [the Board’s] discretion under § 315(c).” *Id.* at *7-8; see also *id.* at *8 (“Broadly exercising the discretion granted to the Director in § 315(c) could effectively circumvent the time limitation in § 315(b) in many cases”; “[t]his would obviate the careful statutory balance.”); *id.* (“The one-year time limitation of § 315(b) is important to ensure ‘quiet title to patent owners’ and to prevent *inter partes* review from being ‘used as [a] tool[] for harassment.’” (citing H.R. Rep. No. 112-98, pt. 1, at 48 (June 1, 2011))).

Another factor that the Board may consider when determining whether to exercise its discretion under § 315(c) is “[t]he conduct of the parties and attempts to game the system.” *Id.* at *9.

The Board may also consider “[e]vents in other proceedings related to the patent at issue.” *Id.* For example, where a Petitioner “has the control and opportunity” to challenge the same patent in another IPR, the Board may “determine that there is no undue prejudice to Petitioner” that requires joinder. *Code200, Uab v. Bright Data Ltd.*, No. IPR2022-01110, 2022 WL 17547777, at *5 (P.T.A.B. Dec. 9, 2022) (denying Petitioner's motion for joinder).

The Board may also consider whether “Petitioner's own conduct created the need for it to request joinder,” in which case the case may not “involve one of the limited circumstances in which the Board will exercise its discretion to allow same party and/or issue joinder.” *Proppant Express v. Oren*, 2019 WL 1283948, at *9.

By considering all of these factors, the Board can carefully balance the interest in preventing harassment against fairness and prejudice concerns on a case-by-case basis, based on the facts then before it. *Id.*

2. Neither Fairness Nor Prejudice Grounds Justify Joinder Here.

Here, the factor of “fairness” does not “require” joinder of Meta's copycat Petition. To the contrary, for multiple reasons, the factor of “fairness” dictates **denial** of Meta's motion for joinder here. **First**, Meta cannot complain that it would be

“unfair” to deny joinder because Meta admittedly knew of X Corp.’s IPR Petition asserting the Kircher and Krug prior art references when Meta filed its first Petition and, therefore, Meta could have asserted those prior art references in its first Petition. Choosing to assert those grounds for the first time in July 2025 – i.e., at least six months after Meta became aware of those grounds of challenge – demonstrates undue delay. **Second**, Meta’s election to **not assert** those references in its own Petition, but to instead wait seven months to join in X Corp.’s proceedings (only after the Board instituted proceedings in the X Corp. IPR), demonstrates an attempt “to game the system.” Certainly, given Meta’s conduct in gaming the system, denying Meta’s motion for joinder creates no unfairness to Meta. To the contrary, it is granting Meta’s motion for joinder that would be unfair **to Patent Owner**, because permitting Meta to join under these circumstances would reward Meta for its undue delay. **Third**, joinder here would be particularly unfair to Patent Owner because, if joined, Meta would avoid the full Section 315(e) estoppel bar (that applies to X Corp.). *See Network-1 Techs. v. HP*, 981 F.3d 1015, 1023-25 (Fed. Cir. 2020).

Finally, another “fairness” factor that weighs in favor of denying joinder here is the fact that the one-year filing deadline has passed. As set forth above, although the Board has discretion to grant joinder even after one-year time bar, the existence of a time bar is one of several factors that may be considered when exercising the Board’s discretion under § 315(c). Here, Meta easily could have met the one-year

filing deadline by including the Kircher and Krug references in its first Petition. Meta did not do so. Instead, Meta waited until (1) the one-year deadline for Meta to file a Petition challenging the '217 Patent claims had passed; and (2) the Board instituted proceedings in the IPR involving X Corp to file its copycat Petition. Although the rules technically permit the Board to overlook the one year filing deadline, the fact that Meta would otherwise be statutorily time barred from pursuing this challenge is another reason the Board should exercise its discretion to deny joinder here.

The second factor the Board considers is whether joinder is required “to avoid undue prejudice.” Here, joinder is **not** required “to avoid undue prejudice.” As discussed above, Meta had an opportunity to assert the Kircher and Krug prior art references in its first Petition filed in January, but Meta elected not to do so. Therefore, Meta would not be prejudiced by denial of its motion for joinder now. *E.g., Code200*, 2022 WL 17547777, at *5 (where a Petitioner had the opportunity to challenge the same patent in another IPR, Board may determine that there is no undue prejudice); *Proppant Express v. Oren*, 2019 WL 1283948, at *5 (in determining whether to exercise discretion to deny joinder, Board may consider whether “Petitioner’s own conduct created the need for it to request joinder”).

Finally, the Board should exercise its discretion to deny joinder here because there is no case-management upside for the Board. If Meta were to join proceedings in an understudy role, there would be no impact on case management.

If, however, X Corp. were to exit the proceedings such that Meta were to participate, then the otherwise-terminated IPR proceeding with X Corp. would continue, burdening the Board with additional time and resources.

For all of these reasons, Patent Owner respectfully requests the Board exercise its discretion to deny Meta's motion for joinder.

C. If Meta's Conditional Motion for Joinder Is Granted, Meta Should Be Restricted to an Understudy Role and Should Not Be Permitted to Submit Evidence or Briefing in the X Corp. IPR Proceeding.

If (1) the Board does not institute proceedings in connection with Meta's first Petition (i.e., if the condition upon which Meta's motion is based comes to pass) and (2) the Board is inclined to grant Meta's Conditional Motion for Joinder, Patent Owner respectfully requests that the Board hold Meta to an understudy role. In particular, if Meta is permitted to join in the X Corp. IPR, (1) Meta should be prevented from asserting any new grounds or evidence; (2) Meta should be required to adopt X Corp.'s expert declaration (and not submit its own expert declaration or evidence); (3) Meta should not be permitted to submit its own filings²; (4) Meta should not be permitted to take its own depositions or participate in oral argument; and (5) Meta should be permitted to take part if, and only if, X Corp. exits that IPR proceeding. If Meta were permitted to participate in the X

² Critically, Meta's submission does **not** agree that Meta will not submit its own filings. Mt. at 6 (reserving the right to submit filings on "issues that do not involve X").

Corp. IPR proceeding, that would multiply the time and costs of trying the X Corp. IPR proceeding and would provide an additional basis for denial.

In addition, If the Board is inclined to grant Meta's Conditional Motion for Joinder (assuming that the Board does not institute proceedings in connection with Meta's first Petition), Patent Owner respectfully requests that the Board (1) keep the schedule in the X Corp. IPR proceeding in place and not permit any extensions of time in connection with any joinder of Meta to that IPR proceeding; and (2) condition Meta's joinder on Meta stipulating to full estoppel on any ground it could have raised (i.e., Meta agrees to be estopped to the same extent X. Corp. is).

IV. CONCLUSION

For the reasons set forth herein, Patent Owner respectfully requests the Board (1) deny Meta's Conditional Motion for Joinder and, consequently, (2) deny Meta's new Petition as untimely under Section 315(b). *See Proppant v. Oren*, 2019 WL 1283948, at *9 ("Because the Motion for Joinder is denied in this case, the exception to § 315(b) does not apply. Therefore, the Petition is denied as untimely under § 315(b).").

Alternatively, if the Board is inclined to grant Meta's Conditional Motion for Joinder (assuming that the Board does not institute proceedings in connection with Meta's first Petition), Patent Owner respectfully requests that the Board place limits upon Meta as set forth above. *See supra* at 14-15.

Respectfully submitted,

Dated: August 11, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. 42.6(e), I certify that on this 11th day of August, 2025, a true and correct copy of the foregoing **Patent Owner's Opposition to Petitioner's Conditional Motion for Joinder** was served by electronic mail on Petitioner's lead and backup counsel at the following addresses:

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