

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner,

v.

DIALECT, LLC,
Patent Owner.

Case IPR2025-01335
Patent 8,015,006

PATENT OWNER'S PRELIMINARY RESPONSE

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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Google LLC v. Dialect, LLC</i> , IPR2024-00748, Paper 11 (PTAB Oct. 11, 2024)
2002	Belcher and Casey, <i>Hacking the Patent System</i> , Juelsgaard Intellectual Property & Innovation Clinic Stanford Law School (May 2014)
2003	Members, Unified Patents (available at https://www.unifiedpatents.com/members)
2004	Order Granting Request for <i>Ex Parte</i> Reexamination, Control No. 90/015,338 (Sept. 19, 2025)
2005	Complaint in <i>Dialect, LLC v. Microsoft Corp.</i> , Civ. No. 2-24-cv-01067 (E.D. Tex. Dec. 20, 2024)
2006	Third Amended Docket Control Order in in <i>Dialect, LLC v. Microsoft Corp.</i> , Civ. No. 2-24-cv-01067 (E.D. Tex. Aug. 6, 2025)
2007	Defendant's Preliminary Invalidity Contentions, <i>Dialect, LLC v. Meta Platforms, Inc.</i> , Civ. No. 7:25-cv-60 (W.D. Tex. Sept. 17, 2025)
2008	Scheduling Order, <i>Dialect, LLC v. Meta Platforms, Inc.</i> , Civ. No. 7:25-cv-60 (W.D. Tex. Aug. 7, 2025)
2009	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Microsoft Corporation v. Dialect, LLC</i> , IPR2025-00655 (lead case), Paper 12 (PTAB Aug. 14, 2025)
2010	Order Acknowledging Stipulation of Dismissal With Prejudice, <i>Dialect, LLC v. Amazon.com, Inc.</i> , Civ. No. 1:23-cv-00581 (E.D. Va. Jan. 23, 2025)
2011	List of Unified Patents' <i>Ex Parte</i> Reexamination Requests Since March 8, 2023, <i>MemoryWeb</i> Decision
2012	Memorandum Opinion, <i>Dialect, LLC v. Amazon.com Inc.</i> , Civ. No. 1-23-cv-581 (E.D. Va. Apr. 29, 2024)
2013	Order (Construing Claim Terms), <i>Dialect, LLC v. Amazon.com Inc.</i> , Civ. No. 1-23-cv-581 (E.D. Va. Apr. 29, 2024)

Pursuant to 37 C.F.R. § 42.107, Patent Owner Dialect, LLC (“Dialect” or “Patent Owner”) files this preliminary response to the Petition, setting forth reasons why the Petition for *inter partes* review (“IPR”) claims 5 and 6 of U.S. Patent 8,015,006 (the “’006 Patent”), as requested by Meta Platforms, Inc. (“Petitioner” or “Meta”), should be denied.¹

I. INTRODUCTION

Petitioner presents four grounds of obviousness against the ’006 patent’s independent claims 5 and 6, organized into two redundant attacks on each claim. Each of these attacks fails. In its challenge of independent claim 5, Petitioner’s proposed combinations fail to satisfy the claimed determination of required and optional values within domain-specific grammars. In its challenge of independent claim 6, Petitioner’s combinations fail to determine required tokens to formulate a response to a question contained in an utterance. Thus, each challenge fails to establish any likelihood of unpatentability against either challenged claim.

The ’006 patent discloses an innovative speech processing system. Central to the features recited in claim 5, the system distinguishes between required and optional parameters when formulating a request in a grammar used by a domain agent, and then extracts and infers criteria from user utterances, so as to generate

¹ By submitting this Preliminary Response, no waiver of any argument is intended by Patent Owner. Patent Owner will have a right to file a complete response to the Petition, should the Board institute *inter partes* review. 37 C.F.R. § 42.120(a).

meaningful requests. As recited in claim 6, the invention also provides techniques to generate meaningful responses. In claim 6, the invention requires determining tokens required to formulate a response to a question contained in an utterance. By determining not just what the request says, but by further interpreting the utterance to determine what is required to respond to the question, the '006 patent discloses a technique directed to ensuring a meaningful response to questions uttered.

As demonstrated below, Petitioner's theories (based Ross, Ittycheriah, Ross018, Hartano, Baker, and Aridor references) fail when addressing these recited aspects of claims 5 and 6. Accordingly, all four grounds of the Petition should be rejected on the merits, and no *inter partes* review should be granted.

II. THE '006 PATENT

The '006 patent is entitled, "Systems and Methods for Processing Natural Language Speech Utterances with Context-Specific Domain Agents," and relates to retrieval of online information or processing of commands through a speech interface.

FIG. 1 of the '006 patent, reproduced below, provides an exemplary schematic diagram view of a system according to an embodiment of the '006 patent:

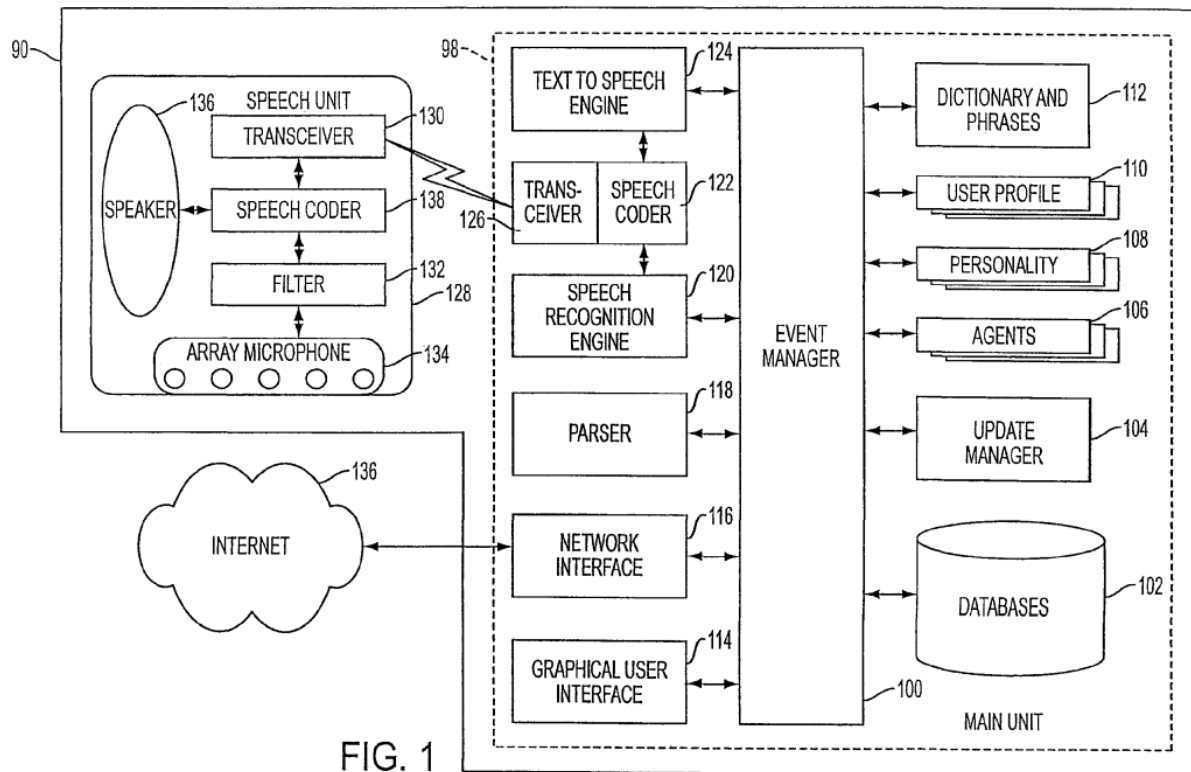


FIG. 1

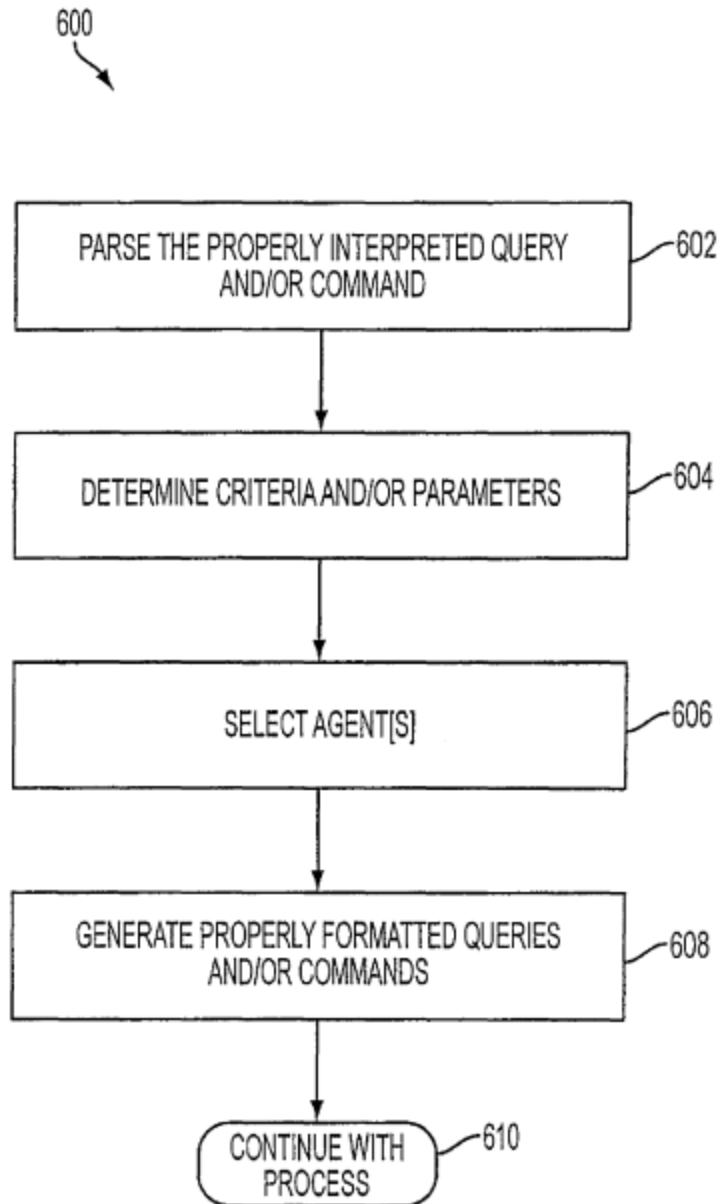
'006 patent, FIG. 1; *see also id.*, 8:54-55. As shown in the figure above, the system 90 may include a main unit 98 and a speech unit 128. The event manager 100 may mediate interactions between other components of the main unit 98. '006 patent, 10:6-10. The speech unit 128 includes one or more microphones, for example array microphone 134, to receive the utterances of the user. The speech received at the microphone 134 may be processed by filter 132 and passed to the speech coder 138 for encoding and compression. In one embodiment, a transceiver module 130 transmits the coded speech to the main unit 98. '006 patent, 10:30-36.

Coded speech received at the transceiver 126 on the main unit 98 is passed to the speech coder 122 for decoding and decompression. The decoded speech is

processed by the speech recognition engine 120 using data in the dictionary and phrases module 112 and received from the agents 106. The recognized words and phrases are processed by the parser 118, which transforms them into complete commands and questions using data supplied by an agent[s] 106. The agent[s] 106 then process the commands or questions. '006 patent, 10:56-64.

More particularly, once the words and phrases have been recognized by the speech recognition engine 120, parser 118 looks for questions or commands, context and criteria. '006 patent, 17:45-49. Once the context for the question or command has been determined, the parser 118 can invoke the correct agent 156, 150. '006 patent, 18:12-14.

Fig. 6 (reproduced below) illustrates a process 600 for determining the proper domain agent to invoke and the proper formatting of queries and/or commands that are to be submitted to the agent ('006 patent, 24:54-62; *see also* 18:12-35, 18:50-54):



Relevant to challenged claim 5, in order to formulate a question or command in the regular grammar used by agents 106, a determination may be made as to the required and optional values for the criteria or parameters of the queries and/or commands. '006 patent, 24:62-65. In order to submit the properly formatted

query and/or command to the agent 106, “*all of the required and some optional tokens for the grammar of the context may be filled in.*” ’006 patent, 25:37-40 (emphasis added); *see also id.*, 18:53-56. These criteria may have been explicitly supplied by the user or may need to be inferred. ’006 patent, 24:65-68.

A context sensitive procedure for extracting the criteria or parameters from the properly interpreted query and/or command may be used. ’006 patent, 25:5-7. Some criteria are determined by executing algorithms in the agent, while others may be determined by applying probabilistic or fuzzy reasoning to tables of possible values. ’006 patent, 25:7-31.

Relevant to challenged claim 6, based on scoring results returned from asynchronous queries, a domain agent 156 may determine if a single best answer can be extracted. ’006 patent, 19:61-63. “For most questions the desired result has *a set of tokens that must be found to formulate an answer.*” ’006 patent, 19:63-64 (emphasis added). Once a value has been found for each of these tokens, the results are ready for presentation to the user. ’006 patent, 19:64-66. The ’006 patent provides examples where, for a question on weather, the tokens can include the date, day of week, predicted high temperature, predicted low temperature, chance of precipitation, expected cloud cover, expected type of precipitation and other tokens. ’006 patent, 19:66-20:3. In another example, where the user utters “please record my favorite TV program,” the system 90 may then generate queries

to determine the name, the channel, and time for the user's favorite TV program.

'006 patent, 23:56-62.

Independent claim 5, which is one of the two independent claims challenged in this proceeding, recites in full:

5. Preamble² A method for processing natural language speech utterances with context-specific domain agents, comprising:

- 5[a]** receiving, at a speech unit coupled to a processing device, a natural language speech utterance that contains a request;
- 5[b]** recognizing, at a speech recognition engine coupled to the processing device, one or more words or phrases contained in the utterance using information in one or more dictionary and phrase tables;
- 5[c]** parsing, at a parser coupled to the processing device, information relating to the utterance to determine a meaning associated with the utterance and a context associated with the request contained in the utterance, wherein the parsed information includes the one or more recognized words or phrases;
- 5[d]** formulating, at the parser, the request contained in the utterance in accordance with a grammar used by a domain agent associated with the determined context, wherein formulating the request in accordance with the grammar used by the domain agent includes:

² The bolded designations added before the preamble and each claim element correspond to Petitioner's designations as set forth in the Petition.

5[d.i] *determining one or more required values and one or more optional values associated with formulating the request in the grammar used by the domain agent;*

5[d.ii] extracting one or more criteria and one or more parameters from one or more keywords contained in the one or more recognized words or phrases, wherein the parser extracts the one or more criteria and the one or more parameters using procedures sensitive to the determined context;

5[d.iii] inferring one or more further criteria and one or more further parameters associated with the request using a dynamic set of prior probabilities or fuzzy possibilities; and

5[d.iv] transforming the one or more extracted criteria, the one or more extracted parameters, the one or more inferred criteria, and the one or more inferred parameters into one or more tokens having a format compatible with the grammar used by the domain agent, wherein the one or more tokens include ***all the required values and one or more of the optional values*** associated with formulating the request in the grammar used by the domain agent;

5[e] processing the formulated request with the domain agent associated with the determined context to generate a response to the utterance; and

5[f] presenting the generated response to the utterance via the speech unit.

'006 patent, claim 5 (emphasis added to element 5[d.i] and 5[d.iv]).

Independent claim 6, which is the other independent claim challenged in this proceeding, recites in full:

6. Preamble³ A method for processing natural language speech utterances with context-specific domain agents, comprising:

6[a] receiving, at a speech unit coupled to a processing device, a natural language speech utterance that contains a request, wherein the request includes at least one command and at least one question;

6[b] parsing, at a parser coupled to the processing device, information relating to the utterance to determine a meaning associated with the utterance and a context associated with the request contained in the utterance;

6[c] formulating, at the parser, the request contained in the utterance in accordance with a grammar used by a domain agent associated with the determined context;

6[d] processing the formulated request with the domain agent associated with the determined context to generate a response to the utterance, wherein processing the formulated request with the domain agent includes:

³ Once again, the bolded designations added before the preamble and each claim element correspond to Petitioner's designations as set forth in the Petition.

6[d.i] directing the at least one command to one or more local or remote processing devices to execute the at least one command; and

6[d.ii] querying one or more local or network information sources to resolve information requested in the at least one question, wherein querying the one or more local or network information sources further includes:

6[d.ii.A] submitting multiple asynchronous queries to the one or more local or network information sources, wherein the multiple queries include one or more duplicate queries submitted to distinct information sources;

6[d.ii.B] asynchronously receiving multiple results to the multiple asynchronous queries from the one or more local or network information sources; and

6[d.ii.C] scoring a relevance associated with the multiple asynchronously received results using a dynamic set of prior probabilities or fuzzy possibilities to determine one or more best responses to the at least one question, wherein scoring the relevance associated with the multiple asynchronously received results to determine the one or more best responses includes:

6[d.ii.C.1] *determining one or more tokens required to formulate a response to the at least one question;*

6[d.ii.C.2] applying one or more scraping criteria to the multiple asynchronously received results to extract one or more values for the asynchronously received results;

6[d.ii.C.3] evaluating the one or more extracted values using the dynamic set of prior probabilities or fuzzy possibilities to resolve ambiguous, incomplete, or conflicting information associated with the one or more extracted values; and

6[d.ii.C.4] selecting one or more best values for the one or more required tokens from the one or more evaluated values, wherein the one or more best responses include the one or more best values for the one or more required tokens; and

6[e] presenting the generated response to the utterance via the speech unit, wherein the response presented via the speech unit includes results associated with the one or more local or remote processing device executing the at least one command and the one or more best responses to the at least one question.

'006 patent, claim 6 (emphasis added to element 6[d.ii.C.1]).

III. CLAIM CONSTRUCTION

Petitioner provides no express claim construction for any term in claims 5 or 6 of the '006 patent. Pet., 16. Even though it provides no express construction, Petitioner nevertheless “reserves the right to argue alternative constructions in other proceedings.” Pet., 16 n.1.

As will be addressed in more detail in Section IV, Petitioner's approach violates 37 C.F.R. § 42.104(b)(3). Further, Petitioner does not propose any interpretation of either the step of “determining one or more required values and one or more optional values associated with formulating the request in the grammar used by the domain agent” recited in claim 5 or the step of “determining one or more tokens required to formulate a response to the at least one question” recited in claim 6. Without waiving its right to submit responsive express constructions in a Patent Owner Response, Patent Owner shows in Section IV that Petitioner's failure to provide its interpretation of the language in these recitations magnifies fundamental flaws in Petitioner's analysis, resulting in Petitioner's failure to establish the disclosure of every claimed element in each independent claim.

IV. PETITIONER'S CHALLENGES FAIL ON THE MERITS

Petitioner's four Grounds can be divided into two redundant attacks on independent claim 5 (Grounds 1 and 3), and two redundant attacks on independent

claim 6 (Grounds 2 and 4).

Concerning claim 5, Ground 1 asserts that claim 5 is obvious in view of Ross,⁴ Ittycheriah,⁵ and Ross018;⁶ and Ground 3 asserts that claim 5 is obvious in view of Hartano⁷ and Baker⁸.

Concerning claim 6, Ground 2 asserts that claim 6 is obvious in view of Ross and Aridor;⁹ and Ground 4 asserts that claim 6 is obvious in view of Hartano and Aridor.

A. Grounds 1 and 3 Fail Against Independent Claim 5 Because Petitioner Fails to Show How the Proposed Combinations Satisfy Element 5[d.i]

Element 5[d.i] recites “determining one or more required values and one or more optional values associated with formulating the request in the grammar used by the domain agent.” Quite simply, Petitioner’s applied references (Ross, Ittycheriah, and Ross018 in Ground 1 and Hartano and Baker in Ground 2) fail to make any such determination.

With regard to Ground 1, it should first be noted that Petitioner’s theories for the “determining one or more required values and one or more optional values”

⁴ Ex. 1005, U.S. Patent Application Publication No. 2002/0133354 (“Ross”).

⁵ Ex. 1007, U.S. Patent 5,937,383 to Ittycheriah (“Ittycheriah”).

⁶ Ex. 1009, U.S. Patent 7,249,018 to Ross (“Ross018”).

⁷ Ex. 1006, PCT Publication No. WO 00/11571 to Hartono (“Hartono”).

⁸ Ex. 1008, U.S. Patent 5,680,511 to Baker (“Baker”).

⁹ Ex. 1010, U.S. Patent 6,636,848 to Aridor (“Aridor”).

aspect of element 5[d.i] flow from a false premise based on a misunderstanding of the ’006 patent and a misinterpretation of the scope of element 5[d.i]. Pet., 33-34.

Petitioner contends that the ’006 patent “does not distinguish between ‘required value[s]’ and an ‘optional value[s].’” Pet., 34 (citing ’006 patent, 18:10-12, 18:49-52, 24:58-61, 25:33-36). This is wrong. The ’006 patent does disclose making a distinction between “required values” and “optional values” because the ’006 patent requires inclusion of “all required values” in a request, but does not need to include all optional values in a request. ’006 patent, 25:37-40; *see also id.*, 18:53-56. Making such a determination reduces the burden of processing the request because after extracting whatever required or optional values are available (*cf.* element 5[d.ii]), the system has to only infer additional required values (*cf.* element 5[d.iii]) and need not perform expensive and burdensome inference processing to derive all optional values (*cf.* element 5[d.iv] (“all the required values and one or more of the optional values”)).

Based on its false premise regarding the ’006 patent and its incorrect interpretation of element 5[d.i], Petitioner then relies on “triples” in Ross018 “because the triples in [Ross018] would be inclusive of all values contained in the utterance, a POSITA would understand such triples would include both all optional and required values.” Pet., 34 (citing “EX1005 [sic, Ross018], 9:49-10:35”; Lopresti ¶185); *see also generally* Pet., 33-34. Constructing a request does not

determine which values in the request are “required values” nor does it determine which are “optional values,” so that, as recited in element 5[d.iv], “all the required values and one or more of the optional values” are included. For example, in the triples in Ross018, nothing is shown by Petitioner to be “optional.” Thus, Ross018 clearly falls short in establishing the claimed features relied upon by the Petition.

Petitioner's citations to Ross018, 7:41-51 and Ross018, 9:49-10:35 do not suggest otherwise. For example, Ross018, 7:41-51 states in full:

To describe a new speech-enabled application 26 to the conversation manager 28, a syntax specifies sentences in a language that describe the kinds of objects, attributes, and operations that the application 26 makes available. To the extent that these objects and classes fit into the built-in domain model hierarchy, the existing grammatical constructs apply to them as well. So, if an application 26 provides an operation for, say, printing it could specify:

print is a kind of action.

file is a patient of print.

and commands such as “print this file” would be available
with no further syntax specification required.

This passage makes no distinction between optional and required values, and plainly fails to disclose or suggest which values are required and which are optional for a given request. Similarly, the citation of Ross018, 9:49-10:35 concerning Ross018's “triples” does nothing to show that any portion of a “triple” is optional. If anything, each portion of Ross018's triples are necessary, thus

confirming that Ross018 fails to disclose or suggest at least “optional values” as required by claim 5.

Accordingly, Petitioner's Ground 1 fails.

Petitioner's Ground 3 fails for similar reasons as Ground 1. Petitioner tries to reason why Hartano's “commands include optional values” (Pet., 61) but does nothing to show that Hartano determines required values and optional values as claimed in element 5[d.i]. In the relied on portions of Hartano, Petitioner points to Table V of Hartono and, more specifically, to its commands of “show me the first message,” “I want to check out my mail” and “I want to know if I got new mail” to argue “Hartano shows how its commands include optional values” and that ““new” is an optional value.” Pet., 61-62.

But Petitioner shows no distinction between different parts of the command “show me the first message” or “I want to check out my mail” such that a particular portion is a “required value” and another portion is an “optional value.” Much like Ross018's triples, Hartano's disclosure indicates that each portion of the command is, if anything, required. Similarly, for the command “I want to know if I got new mail,” Petitioner provides no evidence that Hartano considers any portions of that phrase as required or any portion as optional. Petitioner baselessly asserts that the word “new” in the command is option, but this assertion is wrong as shown by Petitioner's incorrect assertion that different commands would “result

in the same semantic action.” The semantic action for the command “I want to check out my mail” would likely result in opening an email application, whereas the command “I want to know if I got new mail” would result in a binary yes/no response. Accordingly, Petitioner’s attempt to relate these two commands and argue therefore that “new” is an optional value lacks support in the teachings of Hartano.

Moreover, for element 5[d.iv], Petitioner and its expert witness completely ignore the requirement that “the one or more tokens include all the required values and one or more of the optional values associated with formulating the request in the grammar used by the domain agent.” Pet., 65 (citing Lopresti ¶¶315-317). Again, Hartano makes no distinction between “required values” and “optional values” in a command, and Petitioner’s failure to address this aspect of element 5[d.iv] stands as further evidence of the Petition’s deficiencies.

Accordingly, Grounds 1 and 3 against independent claim 5 must fail.

B. Grounds 2 and 4 Fail Against Independent Claim 6 Because Petitioner Fails to Show How the Proposed Combinations Satisfy Element 6[d.ii.C.1]

When resolving “information requested in the at least one question” (element 6[d.ii]), element 6[d.ii.C.1] recites the claimed step of “determining one or more *tokens required to formulate a response* to the at least one question” (emphasis added). In the combinations set out in Grounds 2 and 4, Petitioner relies

on Aridor when attempting to demonstrate this element. Pet., 49. Specifically, as noted below, Petitioner relies on Aridor's "query profile," which Petitioner contends "includes the specific instances of a word or phrase that appears in the utterance for which values are sought (i.e., the requested information)." Petitioner argues as follows:

Aridor's knowledge agent processes the question as a text query (i.e., a "keyword-based query such as those typically submitted to a general-purpose Web search engine."). EX1010, 9:42-49. Aridor does so by creating a "query profile" that "consist[s] of each word in the text query (not including stop-words), along with its lexical affinities, and indicating the number of times each word appears in the query." EX1010, 11:55-59. A POSITA would understand that in creating the query profile thus Aridor *determines one or more tokens required to formulate a response to the question* because the query profile includes the specific instances of a word or phrase that appears in the utterance for which values are sought (i.e., the requested information).

Lopresti ¶246.

Pet., 49 (emphasis in original) (Ground 2); Pet. 74 (substantially identical) (Ground 4). The problem in relying on Aridor's "query profile" is that the "query profile" corresponds to the question asked, and does not consider what tokens are needed to generate a "*response* to the at least one question" as claimed. Instead, as its name suggests, it is a query corresponding to a reformulated version of an utterance, as

acknowledged by Petitioner. Pet., 49 (“consist[s] of each word in the text query (not including stop-words), along with its lexical affinities, and indicating the number of times each word appears in the query.”) (citing Aridor, 11:55-59); *see also* Pet., 74.

In contrast, element 6[d.ii.C.1] recites “determining one or more tokens required to formulate a response to the at least one question.” The ’006 patent explains the operation with an example of an utterance that includes “both aspects of a command and a query or question.” As explained in the ’006 patent, “a user may say, ‘record my favorite TV program’. A query is required to determine the name, the channel, and time for the users favorite TV program. A command must be executed to set a video recorder to capture this program.” ’006 patent, 3:46-53.

The ’006 patent thus looks not to a simple parsing of an utterance but goes further by performing the step of determining what tokens of information are required to respond to a question in an utterance. ’006 patent, 19:63-64 (“For most questions the desired result has a set of tokens that must be found to formulate an answer.”). In the case of the utterance, “record my favorite TV program,” the ’006 patent determines that the required tokens are “the name, the channel, and time for the users favorite TV program.”

Aridor’s query profile generation does not concern itself with what tokens would be required to formulate a response, and Petitioner makes no showing of

how Aridor would determine “required” tokens for a response. This deficiency is all the more evident when it is realized that all Aridor does is return a ranked list of websites for a query, and does not even formulate a response to a question posed in an utterance. Aridor, 11:19-34. Aridor does nothing to determine if the query even asks a question, and simply generates an accounting of an utterance.

As such, Petitioner’s theory for claim 6 is deficient because Aridor fails to disclose or suggest at least element 6[d.ii.C.1]’s claimed step of “determining one or more *tokens required to formulate a response* to the at least one question” (emphasis added). Petitioner offers no other backup theory for this claimed feature, and therefore presents deficient challenges against claim 6 as well. For these reasons, Grounds 2 and 4 against claim 6 must fail.

C. Ground 2 Also Fails Against Independent Claim 6 Because Petitioner Fails to Show How the Proposed Combination Satisfies Element 6[c]

Finally, Ground 2 fails for another independent reason. Petitioner contends that “Ross discloses this limitation [element 6[c]] for the same reasons as 5[d].” Pet., 44. But Petitioner’s analysis of element 5[d] is not based on Ross alone. Rather, the analysis of element 5[d] is based on the combination of Ross and Ross018. Ground 2 does not rely on Ross018 and does not include Ross018 in the asserted challenge.

Therefore, Petitioner's reliance on incorporation by reference and summary assertion against element 6[c] fails under 37 C.F.R. § 42.104(b)(4).

V. CONCLUSION

For the reasons presented above, the Petition should be denied, and no *inter partes* review should be instituted.

Dated: November 19, 2025

/Wayne M. Helge/

Wayne M. Helge, Reg. No. 56,905

James T. Wilson, Reg. No. 41,439

BUNSOW DE MORY LLP

277 S. Washington St., Suite 210 #1088

Alexandria, VA 22314

T: (571) 208-0186

Email: whelge@bdiplaw.com

Email : jwilson@bdiplaw.com

Counsel for Patent Owner

CERTIFICATE OF WORD COUNT

The undersigned certifies that the foregoing PATENT OWNER'S PRELIMINARY RESPONSE complies with the type-volume limitation in 37 C.F.R. § 42.24(b)(1). According to the word-processing system's word count, the brief contains 4,116 words, excluding the parts of the brief exempted by 37 C.F.R. § 42.24(a).

By: /Wayne M. Helge/
Wayne M. Helge (Reg. No. 56,905)
Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing document was served via email, by consent, to Petitioner by serving the correspondence email addresses of record as follows:

Lisa K. Nguyen (Reg. No. 58,018)
David M. Tennant (Reg. No. 48,362)
Diane E. Ghrist (*pro hac vice* to be filed)
Rachel Wu Hankinson (*pro hac vice* to be filed)
ph-meta-dialectipr@paulhastings.com

Dated: November 19, 2025

/Wayne M. Helge/
Wayne M. Helge (Reg. No. 56,905)
Counsel for Patent Owner