

Filed: September 15, 2025

Filed on behalf of:

Petitioner

Crüzr Saddles LLC

By: Brenton R. Babcock (Reg. No. 39,592)
Yang Wang (Ltd. Recog. No. 800,126)
Sterlington, PLLC
228 Park Ave. South #97956
New York, NY 10003
Tel.: (212) 433-2993
Email: brent.babcock@sterlingtonlaw.com
yang.wang@sterlingtonlaw.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CRÜZR SADDLES LLC,

Petitioner,

v.

TETHRD, LLC,

Patent Owner.

Case No. IPR2025-01407

Patent No. 11,964,175

**PETITIONER'S UPDATED MANDATORY NOTICES
PURSUANT TO 37 C.F.R. § 42.8(a)(3)**

Pursuant to 37 C.F.R. § 42.8(a)(3), the undersigned on behalf of Petitioner Crüzr Saddles LLC (“Petitioner” or “Crüzr”) hereby submits the following updated mandatory notices in connection with IPR2025-01407.

I. MANDATORY NOTICES

A. Lead and Back-Up Counsel Pursuant to 37 C.F.R. § 42.8(b)(3)

Patent Owner hereby updates its back-up counsel information to include Mr. Yang’s recently obtained USPTO Limited Recognition Number. An updated Power of Attorney is filed concurrently herewith.

Lead Counsel:

Brenton R. Babcock (Reg. No. 39,592) (*unchanged*)

brent.babcock@sterlingtonlaw.com

Postal and Hand-Delivery Address:

Sterlington, PLLC

228 Park Ave. South #97956

New York, NY 10003

Telephone: (212) 433-2993

Back-up Counsel:

Yang Wang (Ltd. Recog. No. 800,126) (*updated*)

yang.wang@sterlingtonlaw.com

Postal and Hand-Delivery Address:

Sterlington, PLLC

228 Park Ave. South #97956

New York, NY 10003

Telephone: (332) 910-5795

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

(unchanged) Patent Owner Tethrd, LLC (“Tethrd”) has asserted the original ’175 Patent against Crüzr in an original Complaint filed on August 12, 2024, and the corrected ’175 Patent against Crüzr in a First Amended and Supplemental Complaint (“FASC”) filed on December 3, 2024, both cases captioned *Tethrd, LLC v. Crüzr Saddles LLC*, Case No. 1:24-cv-00076 (M.D. Tenn.). Exs. 1007, 1009. Crüzr was served with the original Complaint on August 14, 2024, and the FASC on December 3, 2024. Exs. 1008, 1010.

(unchanged) On October 11, 2024, Tethrd formally requested that the USPTO correct the ’175 Patent’s only independent claim (Ex. 1005 at 4-9), and on November 12, 2024, the USPTO responded by issuing a Certificate of Correction (Ex. 1 at 15; Ex. 1005 at 1-3). Accordingly, the corrected ’175 Patent has been in litigation since December 3, 2024. Exs. 1009, 1010. For purposes of this IPR proceeding, “the ’175 Patent” will refer to the corrected ’175 Patent.

(updated) On August 25, 2025, Crüzr filed an Unopposed Motion to Stay the district court litigation pending this IPR proceeding. Ex. 1146. On September 10, 2025, the Court granted Crüzr’s motion and stayed the co-pending district court litigation. *Id.* at 1.

IPR2025-01407

Crüzr Saddles LLC v. Tethrd, LLC

Respectfully submitted,

STERLINGTON, PLLC

Dated: September 15, 2025

By: / Brenton R. Babcock /
Brenton R. Babcock (Reg. No. 39,592)
Attorneys for Petitioner
Crüzr Saddles LLC

CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) and 42.205(b) on the Patent Owner by e-mail of an electronic copy of this **PETITIONER’S UPDATED MANDATORY NOTICES** at the current known e-mail addresses for the Patent Owner below:

Kaufhold Dix Patent Law

Brendan Dix (brendan@kaufholdlaw.com)
Jason Wormstadt (jason@kaufholdlaw.com)

The undersigned additionally certifies courtesy service pursuant to 37 C.F.R. §§ 42.6(e) and 42.205(b) on litigation counsel for Patent Owner via e-mail of an electronic copy of this **PETITIONER’S UPDATED MANDATORY NOTICES** at the current known e-mail addresses below:

Bradley Arant Boult Cummings LLP

Daniel Huynh (dhuyh@bradley.com)
Eliza del Carmen (edelcarmen@bradley.com)
André J. Bahou (ajbahou@bradley.com)
Josh Kleppin (jkleppin@bradley.com)

Dated: September 15, 2025

/ Brenton R. Babcock /
Brenton R. Babcock (Reg. No. 39,592)
Attorneys for Petitioner
Crüzr Saddles LLC