

Filed: September 27, 2025

Filed on behalf of:

Petitioner

Crüzr Saddles LLC

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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. 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.

(unchanged) 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.

(unchanged) On September 17, 2025, Tethrd filed Reissue Application No. 19/331,004, without providing any notice to Crüzr, seeking to change the ’175 Patent’s priority benefit claim in response to Ground 1 of the Petition in this IPR proceeding. Crüzr first learned of Tethrd’s Reissue Application on September 25, 2025, upon receipt of Tethrd’s belated service of its Mandatory Notices.

(updated) On September 25, 2025, Crüzr filed and served a so-called “*Sotera Plus*” or “*Tesla*” stipulation (inadvertently unsigned) in the above-identified district court litigation. Ex. 1147. On September 27, 2025, immediately upon noticing the inadvertent error, Crüzr re-filed and re-served the so-called “*Sotera Plus*” or “*Tesla*” stipulation (properly signed) in the above-identified district court litigation. Ex. 1148.

Respectfully submitted,

STERLINGTON, PLLC

Dated: September 27, 2025

By: / Brenton R. Babcock /
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Crüzr Saddles LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **PETITIONER’S
UPDATED MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(3)**
is being served on September 27, 2025, electronically via P-TACTS and via
electronic mail to the email addresses below::

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Dated: September 27, 2025

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