

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.
Petitioner

v.

DYNAMIC MESH NETWORKS, INC.
D/B/A MESHDYNAMICS
Patent Owner

Case No. IPR2025-01569
U.S. Patent No. 7,894,385

PETITIONER'S AUTHORIZED SUPPLEMENTAL BRIEF

PETITIONER'S EXHIBIT LIST

Ex.1001	U.S. 7,894,385
Ex.1002	Prosecution History of U.S. 7,894,385
Ex.1003	Declaration of Christopher Hansen, Ph.D. under 37 C.F.R. § 1.68
Ex.1004	<i>Curriculum Vitae</i> of Christopher Hansen, Ph.D.
Ex.1005	U.S. Patent Publication No. 2006/0215583 to Castagnoli
Ex.1006	U.S. Patent No. 5,982,780 to Bohm et al.
Ex.1007	U.S. Patent Publication No. 2006/0198346 to Liu
Ex.1008	U.S. Patent Publication No. 2002/0136170 to Struhsaker
Ex.1009	U.S. Patent Publication No. 2003/0224750 to Sampath
Ex.1010	U.S. Patent Publication No. 2009/0049199 to Kuik et al.
Ex.1011	IEEE Standard 802.11-1999
Ex.1012	Complaint, <i>Dynamic Mesh Networks, Inc. d/b/a MeshDynamics v. Cisco Systems, Inc.</i> , No. 2:25-cv-00472, Dkt. no. 1 (E.D. Tex. May 5, 2025).
Ex.1013	U.S. Patent No. 5,535,338 to Krause et al.
Ex.1014	A. S. Tanenbaum, Computer Networks, 4 th ed. (Prentice Hall PTR) (selected pages)
Ex.1015	J. Henry, 802.11s Mesh Networking (White paper) (The Certified Wireless Network Professional (CWNP) Program)
Ex.1016	A. S. Tanenbaum, Modern Operating Systems, 2 nd ed. (Prentice Hall PTR) (selected pages)
Ex.1017	Intentionally Omitted
Ex.1018	H. Newton, Newton's Telecom Dictionary, 17 th ed. (CMP Books)
Ex.1019	U.S. Patent No. 5,027,431 to Tanaka et al.
Ex.1020	U.S. Patent No. 6,912,215 to Lin et al.
Ex.1021	U.S. Patent No. 7,333,800 to Gopinath
Ex.1022	U.S. Patent No. 7,630,332 to Elliott
Ex.1023	U.S. Patent Publication No. 2004/0100929 to Garcia-Luna-Aceves

Ex.1024	U.S. Patent Publication No. 2006/0003764 to Saglam et al.
Ex.1025	U.S. Patent Publication No. 2006/0117174 to Lee
Ex.1026	U.S. Patent Publication No. 2007/0100396 to Freeberg
Ex.1027	U.S. Patent No. 6,807,163 to Shi
Ex.1028	U.S. Patent Publication No. 2006/0114851 to Gupta et al.
Ex.1029	U.S. Patent Publication No. 2005/0058149 to Howe
Ex.1030	U.S. Patent No. 7,058,027 to Alessi
Ex.1031	U.S. Patent Publication No. 2006/0009244 to Schacht
Ex.1032	U.S. Patent Publication No. 2004/0218562 to Orava et al.
Ex.1033	U.S. Patent No. 5,081,623 to Ainscow
Ex.1034	U.S. Patent No. 4,747,100 to Roach et al.
Ex.1035	U.S. Patent No. 4,803,485 to Rypinski
Ex.1036	Infringement Contentions for U.S. Patent No. 7,894,385, <i>Dynamic Mesh Networks, Inc. d/b/a MeshDynamics v. Cisco Systems, Inc.</i> , No. 2:25-cv-00472 (E.D. Tex.).
Ex.1037	<i>Sotera</i> Stipulation
Ex.1038	FCMS N.D. Cal. Case Management Statistics
Ex.1039	FCMS E.D. Tex. Case Management Statistics
Ex.1040	Prosecution History of U.S. 7,420,952
Ex.1041	Transaction History for U.S. Application No. 10/434,948 (issued as '952 Patent)
Ex.1042	InfoWorld, Issue 47, pp. 13-16 "Cisco Gets Hip to Mesh, Large WLANs" (Nov. 21, 2005)
Ex.1043	Disclaimer of U.S. Patent No. 11,368,537 Under 37 CFR 1.321(a), filed on behalf of Dynamic Mesh Networks, Inc. on December 12, 2025
Ex.1044	U.S. Patent No. 8,514,852
Ex.1045	U.S. Patent No. 7,420,952
Ex.1046	U.S. Patent No. 8,477,762
Ex.1047	U.S. Patent No. 8,520,691

Ex.1048 (NEW)	FCMS E.D. Tex. Case Management Statistics (updated Sept. 2025), available at https://www.uscourts.gov/sites/default/files/document/fcms_na_distprofile0930_2025.pdf
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Petitioner Cisco Systems, Inc. respectfully requests institution of this IPR. The district court's "fast-paced schedule is not particularly relevant...where, like here, the forum itself has not historically resolved cases so quickly." *In re Apple Inc.*, 979 F.3d 1332, 1344 (Fed. Cir. 2020). The most recent statistics from the court show that trial is realistically expected 24.5 months after the complaint's filing date: late September 2027, **more than four months after** the projected Final Written Decision deadline. Ex.1048, 35 ("Median Time," "From Filing to Trial"). While the court has currently scheduled an earlier trial date, the district court always retains control over its docket and schedule; it can and will adjust trial dates as needed to accommodate its other obligations. The objective evidence suggests that it likely will.

Regarding "Fintiv Factor 5" [*sic*, Patent Owner appears to mean Factor 3], Patent Owner notes that Petitioner served invalidity contentions. But the '385 patent invalidity arguments that Petitioner could have made in an IPR will drop out of the litigation if this IPR is instituted. Ex.1021 (Petitioner's *Sotera* stipulation). Petitioner accepts that so much of its work will have been for naught. More relevant to *Fintiv* is that Patent Owner identifies nothing in the litigation's meager progress indicating substantial investment **by the court** in evaluating the '385 patent. "If... the district court has not issued orders related to the patent at issue in the petition, this fact weighs against exercising discretion to deny institution." *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11, 10 (PTAB Mar. 20, 2020) (precedential).

Respectfully submitted,

Dated: January 16, 2026
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CERTIFICATE OF SERVICE

The undersigned certifies that on January 16, 2026, a complete copy of the foregoing **Petitioner's Authorized Supplemental Brief and Exhibit 1048** were served on counsel of record for the Patent Owner by filing the documents through P-TACTS and by sending via electronic mail to the following addresses:

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