

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FEDEX CORPORATION and
FEDEX OFFICE AND PRINT SERVICES, INC.
Petitioners,

v.

VALTRUS INNOVATIONS LTD.
Patent owner.

Case No. **IPR2026-00039**

Patent No. 7,640,332

Patent Owner's Mandatory Notices

Pursuant to 37 C.F.R. § 42.8(a)(2), Patent Owner Valtrus Innovations Ltd. (“Valtrus”) provides the following Mandatory Notices. These notices are timely filed within 21 days of service of the Petition for Inter Partes Review filed by Petitioners FedEx Corporation and FedEx Office and Print Services, Inc. challenging claims of U.S. Patent No. 7,640,332 (the “’332 Patent”).

I. 37 C.F.R § 42.8(b)(1) – REAL PARTY-IN-INTEREST

The real parties-in-interest are Valtrus Innovations Ltd. and Key Patent Innovations Ltd. (“KPI”). Valtrus is the assignee and owner of the ’332 Patent. Valtrus is a subsidiary of KPI. KPI is the beneficiary of a trust pursuant to which Valtrus owns and holds the ’332 Patent.

II. 37 C.F.R § 42.8(b)(2) – RELATED MATTERS

Patent Owner identifies the following related matters that would affect, or be affected by, a decision in this IPR:

- *Valtrus Innovations Ltd. et al v. FedEx Corporation et al*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv-00516-JRG (filed May 9, 2025);
- *Valtrus Innovations Ltd. et al v. NetApp, Inc.*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv-00517-JRG (filed May 9, 2025) (consolidated with Case No. 2:25-cv-00516-JRG);
- *NetApp, Inc. v. Valtrus Innovations Ltd. et al*, United States District Court for the Southern District of New York, Case No. 1:25-cv-06138 (filed July 25, 2025);

- *Valtrus Innovations Ltd. et al v. The Home Depot, Inc. et al*, United States District Court for the Eastern District of Texas, Case No. 2:25- cv- 00081-JRG (filed January 27, 2025);
- *Valtrus Innovations Ltd. et al v. Lenovo Group Limited et al*, United States District Court for the Eastern District of Texas, Case No. 2:25-cv- 00080-JRG (filed January 27, 2025);
- *Starbucks Corporation v. Valtrus Innovations Ltd. et al*, United States District Court for the Western District of Washington, Case No. 2:25-cv- 01859 (filed September 25, 2025); and
- *Ex Parte* Reexamination Request No. 90/015,497, filed by NetApp, Inc., challenging the '332 Patent.

III. 37 C.F.R § 42.8(b)(3) – DISCLOSURE OF COUNSEL

Patent Owner designates the following counsel as Lead and Back-up Counsel:

<i>Lead Counsel</i>	<i>Back-up Counsel</i>
Richard J. Botos (Reg. No. 32,016) BOTOS CHURCHILL IP LAW LLP 430 Mountain Avenue, Suite 401 New Providence, N.J. 07974 Tel. (908) 738-1771 Fax. (908) 320-4441 PTAB@bciplaw.com rbotos@bciplaw.com	Raymond B. Churchill, Jr. (Reg. No. 44,617) BOTOS CHURCHILL IP LAW LLP 430 Mountain Avenue, Suite 401 New Providence, N.J. 07974 Tel. (908) 738-1772 Fax. (908) 320-4441 PTAB@bciplaw.com rchurchill@bciplaw.com

IV. 37 C.F.R § 42.8(b)(4) – SERVICE INFORMATION

Patent Owner respectfully requests that all electronic correspondence be directed to Lead Counsel and Back-up Counsel at the addresses set forth above in Section III. In addition, Patent Owner consents to electronic service by email at the following address: PTAB@bciplaw.com.

Respectfully submitted,

Dated: October 29, 2025

By: /s/ Richard J. Botos/
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CERTIFICATE OF SERVICE

A copy of the foregoing Patent Owner's Mandatory Notice has been served on Petitioner's counsel of record as follows:

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October 29, 2025

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