

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Wybotics, Co. Ltd. f/k/a Tianjin Wangyuan
Environmental Protection and Technology Co., Ltd.
Petitioner

v.

Zodiac Pool Systems LLC
Patent Owner

Case No. IPR2026-00158
Patent No. 11,003,191

**PATENT OWNER'S MANDATORY NOTICE
PURSUANT TO 37 C.F.R. § 42.8**

Patent Owner provides the following mandatory notices pursuant to Rule 42.8.

I. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), the real party-in-interest is Zodiac Pool Systems LLC, the assignee of record for U.S. Patent No. 11,003,191 (“the ’191 patent”).

II. Related Matters

Patent Owner identifies the following matter that may be deemed related pursuant to 37 C.F.R. § 42.8(b)(2):

1. *Zodiac Pool Systems LLC et al. v. Wybotics, Co., Ltd. f/k/a Tianjin Wangyuan Environmental Protection and Technology Co., Ltd.*, Case No. 2:25-cv-582-JRG-RSP (E.D.T.X.)
2. *Wybotics Inc. v. Zodiac Pool Systems LLC*, 2:25-cv-08526-CAS (AGRx) (C.D. Cal.)
3. *Beatbot Technology (USA) Co. Ltd. et al. v. Zodiac Pool Systems LLC*, 3:25-cv-01946-GPC-JLB (S.D. Cal.)
4. *Wybotics, Co. Ltd. f/k/a Tianjin Wangyuan Environmental Protection and Technology Co., Ltd. v. Zodiac Pool Systems LLC*, No. IPR2026-00159 (PTAB)
5. *Wybotics, Co. Ltd. f/k/a Tianjin Wangyuan Environmental Protection and Technology Co., Ltd. v. Zodiac Pool Systems LLC*, No. IPR2026-00160 (PTAB)
6. Pending U.S. Patent Application No. 18/529,301

III. Lead and Back-up Counsel and Service Information

In accordance with 37 C.F.R. § 42.8(b)(3) and (b)(4), Patent Owner identifies the following lead and back-up counsel and service information. Patent Owner agrees to electronic service to the email addresses identified below:

<u>Lead Counsel:</u>	<u>Backup Counsel</u>
Michael T. Morlock Reg. No. 62,245 1100 Peachtree Street NE, Suite 2800 Atlanta, GA 30309 Telephone: 404-815-6003 Fax: 336-734-2756 Email: mmorlock@ktslaw.com	Christopher S. Leah Reg. No. 76,388 1100 Peachtree Street NE, Suite 2800 Atlanta, GA 30309 Telephone: 404-815-6081 Fax: 404-541-4664 Email: cleah@ktslaw.com

Dated: December 19, 2025

By: /Michael Morlock/
Michael Morlock
Reg. No. 62,245
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Mandatory Notice Pursuant to 37 C.F.R. §42.8 has been served electronically via email upon the following:

Matthew W. Johnson – mwjohnson@jonesday.com
Joshua R. Nightingale – jrnightingale@jonesday.com
Adam J. Cook – acook@jonesday.com

Dated: December 19, 2025

By: /Michael Morlock/
Michael Morlock
Reg. No. 62,245
Lead Counsel for Patent Owner