

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner

v.

GOLDEN EYE TECHNOLOGIES LLC,
Patent Owner.

IPR2026-00188
U.S. Patent No. 9,271,243

**PETITIONER'S OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL**

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I. INTRODUCTION

Petitioner Cisco Systems, Inc. (“Cisco”) respectfully seeks PTAB review of the ’243 patent for the protection of U.S. manufacturing and national security interests. The ’243 patent was originally issued to a Korean entity and now appears to be controlled by a Canadian entity, thereby raising the same concerns identified in *Tianma Microelectronics Co. v. LG Display Co.* regarding foreign entities seeking to exploit the U.S. patent system at the expense of American companies: “Opaque investment structures have been used by foreign adversaries to gain influence over, or access to, U.S. intellectual-property assets and proceedings. State-linked entities have covertly financed or directed U.S. patent challenges, acquisitions, or licensing transactions in sectors such as semiconductors, artificial intelligence, quantum computing, and advanced materials.” IPR2025-01579, Paper 12 (March 18, 2026) (precedential).

Cisco, by contrast, is a publicly traded American technology company that supports U.S. manufacturing and employment, both directly and through a network of domestic partners and suppliers. To protect its investments in these U.S.-based operations, Cisco chose to seek the cost-efficient IPR procedure to eliminate the ’243 patent that foreign adversaries are asserting against it.

Institution is also warranted under the *Fintiv* factors:

- **The *Fintiv* factors favor institution:**

Factor	Weight	Reason
1 (stay)	neutral	The outcome of a motion to stay is speculative
2 (trial gap)	against denial	Trial is scheduled after the expected FWD and may be delayed further
3 (investment)	against denial	Markman hearing set five months after institution; Petitioner’s diligent filing
4 (overlap)	against denial	<i>Sotera</i> stipulation
5 (same party)	neutral	Petitioner is defendant
6 (merits)	against denial	Other circumstances favor institution

II. THE FACTS FAVOR REFERRAL

Three considerations independently favor referral: (1) Cisco’s substantial ties to U.S. manufacturing, as recognized by the Director’s recent Memorandum; (2) settled expectations do not apply; and (3) the early procedural posture of the parallel litigation under *Fintiv*.

A. The USPTO Memorandum’s manufacturing factors favor institution.

On March 11, 2026, the Director issued a Memorandum entitled “Additional Discretionary Institution Considerations—U.S. Manufacturing and Small Business Use of AIA Proceedings” (the “Memorandum”). The Memorandum recognizes that “the availability of IPRs...is important to protect American manufacturers” and identifies the following factors relevant to institution:

- (1) the extent to which any products accused of infringement in a parallel proceeding are manufactured in the United States or are related to investments in American manufacturing operations;
- (2) the extent to which any products made, sold, or licensed by the patent owner that compete with the accused products are manufactured in the United States; and ...

Memorandum, 2.

As discussed below, discretionary denial here would frustrate—not further—the Memorandum's stated purpose. Denial would deprive Petitioner Cisco—an American technology company whose products are closely tied to U.S. manufacturing operations—of access to PTAB review, while insulating Patent Owner Golden Eye—a **foreign-controlled non-practicing** entity with no manufacturing operations—from scrutiny. The result would be harm to competition and innovation by U.S. operating companies.

1. Cisco contributes significantly to U.S. manufacturing.

The Memorandum's first factor weighs against discretionary denial because Cisco provides substantial contributions to American manufacturing. The Memorandum makes clear that “manufacturing” is not limited to final assembly but also includes “the extent to which components of a product are made in the United States.” Memorandum, 3. Petitioner Cisco is an American technology company that designs, manufactures, and sells networking equipment throughout the United States and worldwide. Golden Eye has alleged in parallel litigation that

various Cisco products, including Wi-Fi access points, infringe the '243 patent.

Ex.1013. Those accused products (1) are produced through a complex manufacturing ecosystem involving U.S.-based contract manufacturers and a deep American supply chain, and (2) are marketed to, sold to, and used in American factories that manufacture numerous goods.

First, Cisco has demonstrated its commitment to U.S. manufacturing through its Build America, Buy America ("BABA")-certified products for the BEAD Program, including the manufacture of various products in Carrollton, Texas.

Ex.1014. This manufacturing underscores Cisco's ongoing commitment to invest in domestic manufacturing operations across its product portfolio.

Cisco's products are also manufactured through a network of manufacturing partners, several of which maintain substantial operations in the United States. Cisco's Fiscal Year 2024 supplier list reflects a broad base of U.S.-headquartered component suppliers with domestic manufacturing operations. Ex.1015. For example, Flex (formerly Flextronics)—named Cisco's "EMS Partner of the Year" in 2023 (Ex.1016)—maintains multiple U.S. facilities including "advanced manufacturing facility in Columbia, South Carolina" and a "400,000 sq. ft. Flex manufacturing facility in Dallas, Texas." Ex.1017. "Both sites focus on critical power products, enabling faster production at scale for a growing U.S. customer base." Ex.1017.

Additionally, Cisco's products incorporate components sourced from numerous U.S.-based manufacturers, including major domestic suppliers of semiconductors, printed circuit boards, connectors, and interconnect systems—all core aspects of modern electronics manufacturing. These include, among others:

- Intel Corp. (U.S. semiconductor fabrication);
- Broadcom, Inc. (U.S.-based semiconductor company);
- Texas Instruments, Inc. (extensive U.S. fabrication operations);
- Micron Technology, Inc. (U.S.-based memory manufacturer);
- Microchip Technology, Inc. (U.S.-based microcontroller supplier);
- Amphenol Corp. (U.S.-based connector manufacturer); and
- Molex LLC (U.S.-based interconnect manufacturer). Ex.1015.

Second, the accused Wi-Fi access points support investments in American manufacturing operations. Specifically, the access points help “[b]uild a smart and secure factory, ready for Industry 4.0 manufacturing” thereby supporting “[s]mart manufacturing for the modern age.” Ex.1018. U.S.-based manufacturers are able to utilize Cisco's Wi-Fi access points “to automate [their] industrial networks, secure [their] operations, improve IT and operational technology (OT) collaboration, and make [their] manufacturing smarter.” Ex.1018. Accordingly, institution is appropriate because the accused Wi-Fi access points “are related to investments in American manufacturing operations.” Memorandum, 2.

Therefore, Cisco's products—including the accused Cisco Wi-Fi access points—are deeply tied to the American manufacturing base and related to investments in U.S. manufacturing operations. The IPR system was created specifically to enable challenges like this one, and the Memorandum's objective in making available IPRs to businesses with U.S. manufacturing contributions counsels against discretionary denial.

In addition to Cisco's significant support of U.S. manufacturing operations, Cisco contributes to the U.S. technology sector overall. Cisco employs over 47,000 workers in the U.S. Ex.1019, 8. Cisco further invests in workforce development through initiatives like the Cisco Networking Academy, which has trained millions for U.S. employment. Ex.1020.

Additionally, Cisco supplies critical networking infrastructure for government agencies and to all four branches of the military through Cisco "Gold Partners." Ex.1021. Cisco provides significant support to the nation's network security and artificial intelligence endeavors. Cisco's priorities are to "build modern and resilient infrastructure; protect against the cyber threats of today and tomorrow; and harness the power of AI and data." Ex.1019. Using Cisco's products, "public sector agencies now have new ways to safeguard sensitive data, critical infrastructure, and constituent services." Ex.1022.

Cisco's interest in challenging the validity of the '243 patent is not strategic gamesmanship—it is a legitimate effort by an operating company to clear invalid patents that impede its ability to compete and serve its customers.

2. Golden Eye has no U.S. manufacturing operations.

Golden Eye is a foreign-controlled non-practicing entity that acquired patents issued to a Korean entity. The Memorandum's second factor thus weighs against discretionary denial—Golden Eye does not contribute to American manufacturing. Memorandum, 2. The second factor reflects the recognition that certain patent owners—particularly businesses that manufacture products in the U.S.—warrant heightened protection against potentially abusive IPR challenges that could threaten their ability to compete and maintain domestic manufacturing operations. Memorandum, 2. The policy rationale is clear: foreigners should not exploit low-quality patents to tax American companies that create American jobs and invest in domestic production capacity.

Golden Eye is owned by Harfang IP Investment Corp., which is itself wholly owned by Harfang IP Inc.—which appears to be a Canadian entity incorporated in Montreal, Quebec. Ex.1023; Ex.1029. Golden Eye was formed in August 2020, apparently for the sole purpose of acquiring and monetizing patents received from KT Corporation—a South Korean entity whose largest single investor is the Korean government (via the Republic of Korea's National Pension Service).

Ex.1023; Ex.1024; Ex.1026. KT's most recent annual SEC filing also shows that the Korean government has additional indirect ownership interests through KT Corp.'s second-largest shareholder, Shinhan Financial Group. Ex.1027, 86; Ex.1028. Another entity investing in KT Corp. through the Shinhan intermediary is the People's Bank of China, the state-owned central bank of the People's Republic of China. Ex.1028.

As a foreign-controlled non-practicing entity with opaque ownership that is asserting patents obtained from foreign state-backed actors, Golden Eye is not the type of Patent Owner the Memorandum seeks to protect. Golden Eye does not manufacture competing products, employ a substantial domestic workforce, or rely on U.S. patent rights to sustain American production capacity. *See* Ex.1023. On the contrary, Golden Eye's business model consists entirely of obtaining patents—like the '243 patent—from foreign entities and asserting them against U.S. companies that develop, manufacture, and sell products. Given Golden Eye's opaque ownership structure, it is unclear whether funds raised through its licensing and litigation activities will flow back to the foreign government entities that were investors in the original foreign assignee.

Foreign-controlled non-practicing entities like Golden Eye should not be shielded from validity challenges brought by U.S. operating companies. Exercising discretionary denial under these circumstances would invert the Memorandum's

policy objectives by protecting a foreign-controlled patent assertion entity at the expense of a domestic petitioner that supports domestic manufacturing.

3. Denying institution would harm competition and innovation.

The Memorandum should also be read in the context of the IPR system's overarching purpose: to provide an efficient administrative alternative to district court litigation for resolving patent validity disputes. *See* 77 Fed. Reg. No. 157, 48612 (Aug. 14, 2012); *General Plastic Industrial Co., Ltd. v. Canon Kabushiki Kaisha*, IPR2016-01357, Paper 19 at 16-17 (Sept. 6, 2017). Denying institution in this case would not protect an American manufacturer—it would shield a non-practicing entity from accountability for patent claims that may well be invalid.

Golden Eye's licensing activities, which it touts as evidence of settled expectations, in fact highlight why institution is appropriate. If the '243 patent is invalid, then the "licenses" it has obtained represent unwarranted wealth transfers from productive companies to a foreign-controlled entity that contributed nothing to American innovation. The IPR system exists to test such patents and ensure that only valid patents command licensing fees in the marketplace.

The Office should not exercise discretion to insulate the '243 patent from this scrutiny merely because it has been issued for eight years. The passage of time does not make an idea novel or non-obvious, and the Office should institute review

to determine whether the prior art indeed renders obvious the challenged claims.

B. The “settled expectations” doctrine does not apply here.

Golden Eye devotes substantial attention to the “settled expectations” doctrine, arguing that the ’243 patent’s age creates expectations that warrant protection. This argument fails. The settled expectations doctrine applies most forcefully where a patent owner has made substantial investments in reliance on patent validity—such as building manufacturing facilities, developing products, or entering long-term licensing arrangements. Golden Eye—a non-practicing entity—has done none of these things. Golden Eye’s business model is to acquire patents and assert them against operating companies, not to commercialize patented technology. As such, the policy rationale underlying the settled expectations doctrine simply does not apply to such entities. Moreover, Golden Eye has owned the ’243 patent for less than six years, having acquired it from KT Corporation on September 21, 2020. Ex.1024. For the additional reason that Golden Eye has not owned the patent for at least six years, it cannot have developed settled expectations about the patent.

C. Discretionary denial under *Fintiv* is not warranted.

The *Fintiv* factors, considered as a whole, do not warrant discretionary denial. *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (Mar. 20, 2020)

(precedential). Each factor either favors institution or is neutral, and none weighs in favor of denial.

1. Factor 1 is neutral: No evidence regarding a stay.

With no stay motion pending, the Board should not speculate as to whether one would be granted. *Sand Revolution II, LLC v. Continental Intermodal Grp. Trucking LLC*, IPR2019-01393, Paper 24 at 7 (June 16, 2020) (informative).

2. Factor 2 favors institution: Trial is after the projected statutory deadline.

Factor 2 favors institution. Trial is currently set for August 16, 2027, which is more than one month after the projected due date for the Final Written Decision on July 13, 2027. Ex.2001, 1. *See Apple Inc. v. Apex Beam Techs. LLC*, IPR2025-00908, Paper 10 (Sept. 19, 2025) (referring the IPR where the district court trial was weeks after the FWD deadline); *FreightCar Am. Inc. v. Nat'l Steel Car Ltd.*, IPR2025-01046, Paper 20 at 2 (same).

Golden Eye, without any support, argues that the proximity of the EDTX trial date to the projected Final Written Decision ("FWD") "weighs heavily in favor of discretionary denial." DD Req., 5. Notably, Golden Eye fails to identify a single case where the Office found factor 2 to weigh in favor of denial where trial was scheduled *after* expected FWD. And the only case it cites is one where trial was set *before* FWD. DD Req., 5 (*citing Shenzhen Tuozyu Tech. Co. v. Stratasy*,

Inc. IPR2025-00354, Paper 11 at 2 (June 12, 2025)). The timeline here—with trial scheduled 5-6 weeks *after* FWD—provides the district court the benefit of the Board's determination and promotes, rather than undermines, efficiency.

Additionally, it is uncertain that the district court trial will begin on the scheduled date. Thirteen other cases are currently scheduled for jury selection on August 16, 2027, making it unlikely that this case will proceed to trial that day. Ex.1025. The Board has recognized that scheduled trial dates are not immutable. *See Boe Tech. Grp. Co. v. Optronix Sci. LLC*, IPR2024-01130, Paper 16 at 10 (Jan. 27, 2025) (“Because a number of cases are scheduled for jury selection on January 5, 2026 in addition to the parallel proceeding, there is some uncertainty whether the trial in that proceeding would actually begin on that date.”). The realistic prospect of further delay—beyond the more-than-a-month-long trial gap—further weighs against discretionary denial.

3. Factor 3 weighs against denial: Minimal relevant investment and diligent filing.

Factor 3 weighs against discretionary denial because the co-pending litigation is in its early stages, and Petitioner acted diligently to file its petition.

Golden Eye characterizes the EDTX litigation as being in an “advanced stage,” but that characterization is unsupported. DD Req., 1. Although the parties have exchanged contentions and commenced fact discovery, no claim construction

briefing or hearing has occurred, no dispositive motions have been filed, and trial is still well over a year away. Investment in the related proceeding has been minimal, as there will be no claim construction briefing or hearing until well after institution. Preliminary claim constructions are due on October 19, 2026, and the Markman hearing is scheduled for February 1, 2027—more than six months after the Board's expected institution decision deadline of July 13, 2026. Ex.2001, 4. Per *Fintiv*, “[i]f, at the time of the institution decision, 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.” *Fintiv*, 10. Here, the court will therefore not issue an order related to claim construction until long after the institution decision is set to occur. The lack of an order addressing a dispute related to the ’243 patent thus weighs against discretionary denial.

This factor also weighs against denial because the Petitioner worked diligently to file the instant petition after receiving Patent Owner's infringement contentions. *Fintiv*, 11. Petitioner received infringement contentions on November 10, 2025, and worked diligently to file three IPR petitions, including the instant petition, in just over two months. The Board has recently agreed that similar diligence is reasonable and weighs against denial. *See Samsung Elecs. Co. v. Mullen Indus. LLC*, IPR2024-01472, Paper 9 at 10 (Mar. 31, 2025) (“Petitioner's diligence in filing its Petition (a) less than five months after receiving Patent

Owner's infringement contentions and (b) prior to the parties briefing claim

construction issues weighs against exercising discretionary denial."); *see also Samsung Elecs. Co. v. Headwater Rsch. LLC*, IPR2024-01396, Paper 13 at 7 (Apr. 1, 2025) ("[W]e find Petitioner's diligence in filing its Petition approximately 4 months before it was statutorily required to do so, and while litigation is in its early stages, weighs against denial, not for it.").

Because investment in the related proceeding has been relatively minimal, Factor 3 weighs strongly against denial.

4. Factor 4 weighs strongly against denial: Petitioner's *Sotera* stipulation.

Factor 4 weighs strongly against denial given that Petitioner has made a *Sotera* stipulation. Petition, 14. Golden Eye argues that the stipulation is "hollow" and ineffective. DD Req., 10. By offering a *Sotera* stipulation, Petitioner has committed to not pursuing in the district court any ground that was raised or reasonably could have been raised in this IPR. This commitment reduces the risk of duplicative proceedings and inconsistent outcomes—the very concerns the *Fintiv* framework addresses.

Moreover, Golden Eye's reliance on the Federal Circuit's decision in *Ingenico Inc. v. IOENGINE, LLC*, 136 F.4th 1354 (Fed. Cir. 2025), is inapposite. That decision addressed the scope of IPR estoppel under 35 U.S.C. § 315(e), not

the effect of a *Sotera* stipulation. Unlike statutory estoppel, a *Sotera* stipulation is a voluntary commitment that goes beyond the statutory requirements, and the Board has historically credited such stipulations as a significant factor weighing against discretionary denial. *Sotera* stipulations remain “highly relevant” to the *Fintiv* analysis (March 2025 Memo).

5. Factor 5 is neutral: Petitioner is a defendant in the parallel litigation.

Cisco is a defendant in parallel litigation. That is true of most IPR petitioners; therefore, this factor is neutral. *See HP Inc. v. Slingshot Printing LLC*, IPR2020-01084, Paper 13 at 9 (Jan. 14, 2021); *see also NVIDIA Corp. v. Invensas Corp.*, IPR2020-00603, Paper 11 at 23 (Sept. 3, 2020) (this factor weighs against discretionary denial where the district court trial and IPR final written decision are expected “around the same time”).

6. Factor 6 weighs against denial: Other circumstances warrant institution.

Factor 6 favors institution because other circumstances, such as Cisco's manufacturing contributions “serve the interest of overall system efficiency and integrity.” *Fintiv*, 15.

In summary, each *Fintiv* factor is either neutral or weighs against discretionary denial, and the factors considered support institution.

**III. PATENT OWNER'S HOLISTIC ARGUMENTS ARE MERITLESS
AND DO NOT WARRANT DISCRETIONARY DENIAL**

A. The Petition has strong merit.

Golden Eye's attempt to litigate the merits of the Petition in a discretionary denial brief is premature and should be given limited weight at this stage. The question of whether the prior art combinations render the challenged claims obvious is precisely the issue the Board is designed to adjudicate through the institution and trial process. Golden Eye's argument that the cited references allegedly do not teach "*grouping wireless access points using a same channel*" is a substantive merits arguments that are properly addressed in Patent Owner's Preliminary Response and, if institution is granted, through full briefing and hearing. Nevertheless, several points warrant brief response.

Contrary to Golden Eye's assertions, the Petition explains how Hills expressly teaches grouping access points by physical location (e.g., "a floor of a building") and that there are instances where Hills' grouped access points use the same channel. *See* Petition, 30-34. Furthermore, Golden Eye's complaint about the Petition identifying elements 16 and 18 as "access elements" mischaracterizes the substance of the Petition's analysis, based on a single typographical error. The Petition repeatedly cited to Hills' "access elements 12 and 14." Petition, 21, 31-32. The relevant teaching of Hills—that access elements 12 and 14 on the same floor use the same channel—is clearly established.

Moreover, Golden Eye's arguments regarding independent claim 11 are meritless. The Certificate of Correction change from plural "*points*" to singular "*point*" does not detract from the Petition's analysis. The Petition showed that each of the plurality of points perform the claimed method step, and therefore it logically follows that a single "*point*" likewise performs the method step.

The Petition presents a compelling invalidity case, and Golden Eye's premature merits arguments should not deter institution. The Board routinely institutes proceedings where patent owners raise similar objections, as such arguments go to the heart of the obviousness inquiry and require the full evidentiary record developed during trial.

B. Reliance on expert testimony is appropriate and expected.

Golden Eye's arguments regarding reliance on Expert testimony are meritless. Expert declarations are a standard and expected component of IPR petitions. *See* 37 C.F.R. § 42.65. Consistent with the rules, Petitioner's expert, Dr. Hansen, explains how the prior art references teach or suggest claim limitations, establishes the knowledge and perspective of a person of ordinary skill in the art, and supports reasons to combine. *See* Ex.1003, *generally*. Dr. Hansen's testimony is based on evidence, including disclosure in the prior art references Hills (Ex.1005) and Wang (Ex.1006) and several tertiary references (e.g., Ex.1008 to Ex.1014).

Golden Eye's assertion that the Petition included "sole citations to Hansen's Declaration regarding Hills, Wang, and their combination" is meritless. DD Req., 19-20. On the contrary, the Petition explicitly cites to the teachings of Hills and Wang and explains how the combination discloses the claim limitations. The Petition cites Dr. Hansen's Declaration as evidence from the perspective of a POSITA. These citations demonstrate that Petitioner has thoroughly supported its invalidity theories with qualified expert analysis.

Accordingly, institution is favored because the Petition relies on the cited patent references—not merely Dr. Hansen's testimony—for each and every limitation of the claims.

IV. CONCLUSION

The above discussed factors provide compelling reasons to institute review and permit the Office to assess the validity of the '243 patent on the merits.

Respectfully submitted,

Date: April 13, 2026

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Opposition to Patent Owner's Request for Discretionary Denial
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PETITIONER'S UPDATED EXHIBIT LIST

Ex.1001	U.S. Patent No. 9,271,243.
Ex.1002	Prosecution History of U.S. Patent No. 9,271,243.
Ex.1003	Declaration of Dr. Christopher Hansen under 37 C.F.R. § 1.68.
Ex.1004	<i>Curriculum Vitae</i> of Dr. Hansen.
Ex.1005	U.S. Patent No. 7,313,113 to Hills et al. ("Hills").
Ex.1006	CN101626615A Certified English Translation to Wang et al. ("Wang").
Ex.1007	Original CN101626615A.
Ex.1008	Sorting Algorithms.
Ex.1009	Data Communications Basics - A Reference Guide.
Ex.1010	IEEE 802.11 Standard (2007).
Ex.1011	U.S. Patent No. 8,040,861 to Calhoun et al. ("Calhoun").
Ex.1012	Cisco White Paper, Radio Resource Management under Unified Wireless Networks, Document ID 71113.
Ex.1013 (NEW)	Complaint, <i>Golden Eye Technologies LLC v. Cisco Systems, Inc.</i> 2-25-cv-00898 (EDTX) (August 27, 2025).
Ex.1014 (NEW)	Cisco Build American, Buy America (BABA) Certification.
Ex.1015 (NEW)	Cisco Supplier List.
Ex.1016 (NEW)	Flex Honored as Cisco's EMS Partner of the Year.
Ex.1017 (NEW)	Flex Domestic Manufacturing.
Ex.1018 (NEW)	Cisco Wi-Fi Marketing for Manufacturers.

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Ex.1019 (NEW)	Cisco 10-k form.
Ex.1020 (NEW)	Cisco Networking Academy Impact.
Ex.1021 (NEW)	Cisco GEMSS Contract Details.
Ex.1022 (NEW)	Cisco Public Sector Highlights.
Ex.1023 (NEW)	Mondaq Article on Harfang IP.
Ex.1024 (NEW)	Assignment Record.
Ex.1025 (NEW)	EDTX Docket for August 16, 2027.
Ex.1026 (NEW)	KT Corporation Investors
Ex.1027 (NEW)	SEC Form 20f
Ex.1028 (NEW)	Shinhan Financial Group
Ex.1029 (NEW)	Corporate Disclosure Statement, <i>Golden Eye Technologies LLC v. Cisco Systems, Inc.</i> 2-25-cv-00898 (EDTX) (August 27, 2025)

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service April 13, 2026

Manner of service Electronic Email: tsaad@bosfirm.com;
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Documents served ***PETITIONER'S OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL;
EXHIBITS Ex.1013 – Ex.1029.***

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