UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDTRONIC, INC.,
Petitioner

v.

MOSKOWITZ FAMILY LLC,
Patent Owner

Case No. IPR2026-00217
Patent No. 10,426,633

PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL

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PATENT OWNER'S EXHIBIT LIST

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2001	Pretrial Scheduling Order, *Moskowitz Family LLC v. Medtronic, Inc. et. al.,* No. 0:25-CV-00769-PJS-DLM, ECF No. 36 (Dist. Of Minn. September 10, 2025) (Micko, D.)
2002	Stipulation Extending Time For Defendants To Respond To Plaintiff's Complaint, *Moskowitz Family LLC v. Medtronic, Inc. et. al.,* No. 0:25-CV-00769-PJS-DLM, ECF No. 15 (Dist. Of Minn. March 19, 2025)
2003	Stipulation Extending Time For Defendants To Respond To Plaintiff's Complaint, *Moskowitz Family LLC v. Medtronic, Inc. et. al.,* No. 0:25-CV-00769-PJS-DLM, ECF No. 24 (Dist. Of Minn. May 22, 2025)
2004	Minute Entry re Hearing on Motion to Stay, *Moskowitz Family LLC v. Medtronic, Inc. et. al.,* No. 0:25-CV-00769-PJS-DLM, ECF No. 68 (Dist. Of Minn. March 6, 2026)
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2006	October 3, 2025 Update to USPTO Interim Director Discretionary Process
2007	March 24, 2025 Guidance on USPTO's recission of "Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District court Litigation"

2008	USPTO FAQs for Interim Processes for PTAB Workload Management (Archived)
2009	Amended Pretrial Scheduling Order, *Moskowitz Family LLC v. Medtronic, Inc. et. al*., No. 0:25-CV-00769-PJS-DLM, ECF No. 44 (Dist. Of Minn. January 20, 2026)
2010	Second Amended Complaint, *Moskowitz Family LLC v. Medtronic, Inc. et. al*., No. 0:25-CV-00769-PJS-DLM, ECF No. 48 (Dist. Of Minn. January 29, 2026)
2011	Complaint, *Moskowitz Family LLC v. Medtronic, Inc. et al.,* No.0:25-cv-00769, ECF No. 1 (Dist. Of Minn February 28, 2025)
2012	*Uniloc USA, Inc. v. Motorola Mobility LLC*, Case No. 2:16-CV-00992-JRG, ECF No. 125 (E.D. Tex. Apr. 5, 2017)) (Gilstrap, J.)
2013	Patent Trial And Appeal Board Standard Operating Procedure 1 (Revision 16) Assignment Of Judges To Panels

I. INTRODUCTION

The Director should deny institution. This Petition comes years after the patent issued, relies on prior art the Office already considered, and presents no compelling reason to revisit that work. It also turns on whether the primary reference—Palmatier—qualifies as prior art at all, a threshold issue Patent Owner disputes and that must be resolved before the Board could reach the merits. And it is one of several staggered petitions repeating the same theory across related patents. Each of these points independently supports discretionary denial.

First, the '633 patent carries strong settled expectations. It has been in force for over six years—beyond the benchmark the Director has identified as favoring discretionary denial. Medtronic chose not to challenge the patent during its long public life and waited until after being sued to file this Petition. That timing matters. Discretion exists to prevent precisely this kind of late disruption.

Second, the Petition is not a fresh challenge. It is built on Palmatier—the same reference the Examiner addressed during prosecution of the '633 patent's parent—and pairs it with additional references that were also before the Office numerous times. The core theory is unchanged from prior prosecution: Petitioner simply repackages Palmatier by pointing to a different embodiment and combining it with familiar teachings. That is not a compelling reason to reopen examination.

Third, the Petition rises or falls on Palmatier's status as prior art. It is not. Patent Owner will show prior conception and diligent reduction to practice, removing Palmatier from the prior art field and collapsing every asserted ground. At a minimum, this threshold issue confirms that this is not a clear or compelling case for institution.

Finally, this Petition is part of a broader campaign. Medtronic has filed a staggered series of petitions against several related patents advancing the same Palmatier-based theory. Institution here would not streamline the dispute— it would multiply proceedings addressing the same issues.

Any one of these points supports discretionary denial. Together, they make denial straightforward. The Director should deny institution.

II. THE DIRECTOR SHOULD EXERCISE DISCRETION UNDER § 314(a) TO DENY INSTITUTION.

Section 314(a) gives the Director broad discretion to determine whether an inter partes review should proceed. The USPTO "is permitted, but never compelled, to institute" an IPR, even when a petition meets the statutory thresholds. *Nautilus Hyosung Inc. v. Diebold, Inc.*, IPR2017-00426, Paper 17 at 11 (PTAB June 22, 2017). That discretion is properly exercised to deny institution where parallel district-court litigation will resolve the same validity issues, making Board review duplicative rather than efficient. *NHK Spring Co. v. Intri-Plex Techs., Inc*., IPR2018-00752, Paper 8 at 20 (PTAB Sept. 12, 2018) (precedential, designated May 7, 2019).

To guide that inquiry, the Office has identified a set of practical considerations—commonly referred to as the *Fintiv* factors—that assess whether an IPR would advance or hinder efficient dispute resolution in the presence of parallel litigation, including the likelihood of a stay, the progress and investment in the district-court action, the degree of overlap between the proceedings, the identity of the parties, and other circumstances bearing on discretion, including the merits. *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 5–6 (PTAB Mar. 20, 2020).

The Director's guidance also makes clear that discretionary denial is not limited to the *Fintiv* factors. Separate and independent considerations—including the parties' settled expectations and "other considerations bearing on the Director's discretion"—may independently warrant denial. Director's March 26, 2025 Memorandum, *Interim Processes for PTAB Workload Management*, at 2-3. Decisions applying settled expectations show that long-standing notice and late-filed petitions weigh strongly against institution even when some *Fintiv* factors favor institution. *Dabico Airport Solutions Inc. v. AXA Power APS*, IPR2025-00408, Paper 21 at 3 (Acting Director Stewart June 18, 2025); *iRhythm Techs., Inc. v. CardioNet, LLC*, IPR2025-00363, Paper 10 at 3 (Acting Director Stewart June 6, 2025).

A. The Parties' Settled Expectations Strongly Favor Discretionary Denial.

The Director's recent decisions place substantial weight on settled expectations—and those expectations are strong here. The '633 patent has been in

force for over 6 years. That alone places it squarely within the category of patents for which the Director has found settled expectations to favor denial. *Dabico Airport Solutions Inc. v. AXA Power APS,* IPR2025-00408, Paper 21 at 3 (Acting Director Stewart June 18, 2025) ("[T]he longer the patent has been in force, the more settled expectations should be."); *see also Amgen Inc. v. BristolMyers Squibb Company*, IPR2025-00601, -602, Paper 9 at 3 (July 24, 2025) (patents in force for seven and six years created "strong settled expectations").

Settled expectations are not easily displaced. The Director has denied institution based on settled expectations even where a final written decision could issue before trial or where the district court case was stayed. *OnePlus Tech. Co., Ltd. v. Pantech Corp*., IPR2025-00637, Paper 17 at 2 (August 14, 2025) (denying institution despite vacated trial date); *Kahoot! AS v. Interstellar Inc*., IPR2025-00696, Paper 12 at 2 (July 31, 2025) (denying institution despite a stay based on a 6-year-old patent).

Petitioner's conduct further reinforces those expectations. Medtronic did not challenge the '633 patent during its many years in force. And even after being sued, it waited more than ten months before filing this Petition. That delay reflects a deliberate choice to forgo early review and allow reliance interests to deepen. The Director has recognized that such delay "favors denial." *iRhythm Techs., Inc. v.*

CardioNet, LLC, IPR2025-00363, Paper 10 at 3 (Acting Director Stewart June 6, 2025).

Taken together, this is a mature patent, long in force, that Petitioner chose not to challenge until well after litigation began. Under the Director's guidance, those settled expectations are substantial—and they weigh strongly against institution.

B. *Fintiv* Factor 1 Favors Denial Because Medtronic Sought a Stay and the Court Denied It.

Factor 1 favors discretionary denial because Medtronic asked the district court to stay this case based on multiple filed IPR petitions, and the court denied that request. Ex. 2004. The court was not willing to pause the case based on un-instituted petitions and instead allowed the litigation to proceed, permitting renewal only if circumstances materially change.

That ruling reflects the posture of this case. A stay would not meaningfully simplify the litigation. The district court action involves twelve asserted patents, numerous asserted claims, and multiple accused product lines. *See e.g.,* Ex. 2010, ¶¶ 11, 22, 67, 88, 115, 144, 158, 181, 201, 224, 247, 269, 289, 308. Medtronic's IPR filings reach only part of that dispute. Several asserted patents are not subject to any IPR at all, and others cannot be challenged due to the statutory time bar. Even if this Petition were instituted, the court would still need to proceed on claim construction, infringement, and invalidity issues for substantial portions of the case.

In other words, the case will move forward regardless of institution. A stay would not streamline the litigation—it would delay resolution while leaving the bulk of the dispute intact. That is precisely why courts deny stays where IPRs have not been instituted or would not materially narrow the case. *E.g.*, *Hutchinson Tech. Inc. v. Nitto Denko Corp.*, No. 17-CV-1992, 2018 WL 5984873, at *14–15 (D. Minn. Sept. 19, 2018); *Stratasys, Inc. v. Microboards Tech., LLC*, No. 13-3228, 2015 WL 1608344, at *2 (D. Minn. Apr. 10, 2015); Ex. 2012 at 3; *Dane Techs., Inc. v. Gatekeeper Sys., Inc.*, No. 12-2730 ADM/AJB, 2013 WL 4483355, at *2-3 (D. Minn. Aug. 20, 2013).

The Board has recognized that when "no stay is likely to be entered," Factor 1 "leans towards denial of institution." *Mylan Labs. Ltd. v. Janssen Pharm. NV*, IPR2020-00440, Paper 17 at 13–14 (PTAB Sept. 16, 2020). That is the situation here. Medtronic sought a stay and did not obtain one, and the structure of this case confirms that a stay would not promote efficiency. Factor 1 favors denial.

C. *Fintiv* Factors 2 and 3 Favor Denial Because the District Court Action Will Be Well Underway Before Any Institution Decision.

Factors 2 and 3 favor discretionary denial because, by the time the Director decides institution, the district court case will already be moving through the stage that defines the issues for trial. That work will continue regardless of any IPR

This action was filed in February 2025. Ex. 2011. By the expected July 2026 institution decision, the parties will have exchanged infringement and invalidity

contentions, discovery will be underway, and the claim-construction process will be imminent under the district court's revised schedule. Ex. 2009. Those are not preliminary steps. They are the steps that crystallize the parties' positions and shape the case for trial. *BOE Tech. Grp. Co. v. Element Capital Commercial Co*., IPR2023-00808, Paper 9 at 23–24 (PTAB Nov. 15, 2023).

That investment is not speculative. It is locked in. Medtronic's invalidity contentions are due in April 2026, and claim construction follows soon after. Once those positions are served and the claim construction process begins, the parties and the Court will have committed substantial resources to the same patent family, the same accused products, and overlapping validity issues. Institution would not get ahead of that work. It would trail it.

Nor can Medtronic minimize the district court's progress by pointing to the current schedule. Medtronic itself helped create that timeline. It obtained a 60-day extension to respond to the complaint, then additional extensions tied to its demand that Patent Owner amend the complaint. Exs. 2001-2003. Later, after a continuation patent issued in December 2025, Medtronic conditioned its consent to adding that patent on another three-month extension of invalidity, non-infringement, and claim-construction deadlines. Exs. 2005; 2009. Those extensions pushed back milestones that otherwise would already be further along. Medtronic should not benefit from delay it helped create.

The stay proceedings underscore the same point. Medtronic waited until the end of the statutory window, filed its petitions in staggered waves, and ensured that the scope of any possible PTAB review would remain uncertain well into 2026. Meanwhile, the district court case continues to advance. By institution, the court will already be adjudicating the dispute in a meaningful way. Board review at that point would duplicate investment, not conserve it.

This is not a case where the Board would step in before meaningful work has occurred elsewhere. By institution, substantial work will already have been done, and more will be underway. Factors 2 and 3 therefore favor denial.

D. *Fintiv* Factor 4 Favors Denial Because Institution Would Not Eliminate Overlap or Meaningfully Simplify the District Court Proceedings.

Factor 4 favors discretionary denial because institution would not materially narrow the district court case. Medtronic's IPR campaign leaves most of the dispute intact, ensuring that the same issues will be litigated in parallel regardless of what happens here.

The scope of what remains is substantial. Medtronic failed to challenge some or all asserted claims in six of the twelve asserted patents. It leaves 60 of the 150 asserted claims for the district court to resolve. And it leaves seven of the eight accused product lines in the case regardless of institution—including systems central to the dispute such as Divergence, Sovereign, Elevate, Catalyft PL and PL40, and

the Endoskeleton TAS and TCS platforms. Even if Medtronic prevailed on every challenged claim, the district court would still adjudicate multiple patents, dozens of claims, and nearly the entire accused product lineup. This proceeding would not replace the district court's work. It would run alongside it.

The lack of simplification is particularly clear for the Elevate and Catalyft systems, which are at issue under the '633 patent. Medtronic did not challenge the '088 patent at all and left one asserted claim of the '284 patent untouched—ensuring that these same products remain in the case regardless of institution. The same technical discovery, infringement analysis, and damages issues for Elevate and Catalyft will proceed unchanged regardless of institution. That is not simplification—it is partial coverage.

Although Petitioner has filed a stipulation in the district court, it has not submitted any stipulation in this proceeding. The Office's Interim Director Discretionary Process instructs petitioners to file such stipulations "as soon as practicable." Ex. 2006 at 3. That omission leaves both scope and timing uncertain.

Petitioner's stipulation does not meaningfully reduce the overlap. The Director has made clear that such stipulations are "not dispositive" where other invalidity theories remain available. Ex. 2007 at 2–3. Medtronic remains free to pursue system prior art, public-use and on-sale theories, and combinations involving non-printed publications—none of which are subject to IPR estoppel. *See Ingenico*

Inc. v. IOENGINE, LLC, 136 F.4th 1354, 1365–66 (Fed. Cir. 2025). Where those theories remain in play, any efficiency gained from Board review is necessarily limited. Ex. 2008 at 3.

The problem is compounded by the asserted patent family. Multiple related patents will remain in the district court regardless of institution. Nothing prevents Medtronic from asserting the same prior art and arguments against those family members in district court. In that posture, Board review is a parallel track addressing the same issues. The Office has denied institution on that basis, even where a *Sotera* stipulation was offered. *See SAP Am., Inc. v. Cyandia, Inc.*, IPR2024-01495, Paper 13 at 8–9 (Apr. 7, 2025); *Motorola Sols. v. Stellar, LLC*, IPR2024-01205, Paper 19 at 3–4 (PTAB Mar. 28, 2025).

Because the same invalidity issues will be litigated regardless of institution, Board review would duplicate effort and risk inconsistency. Factor 4 favors denial.

E. *Fintiv* Factor 5 Favors Denial Because the Same Parties are Litigating the Same Disputes in District Court.

Factor 5 favors discretionary denial because Petitioner is the defendant in the parallel district-court action, and the same parties are already litigating the same patent family and overlapping invalidity issues there. *Fintiv*, at 13–14; *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 19 (PTAB Dec. 1, 2020). Where, as here, a single district-court proceeding between the same parties

will resolve their disputes regardless of institution, an IPR does not promote efficiency or conserve resources.

F. *Fintiv* Factor 6 Favors Denial Because the Petition Does Not Present Compelling Merits.

Factor 6 also favors discretionary denial because the Petition does not present compelling merits. At this stage, the question is not whether the Petition is facially plausible, but whether its merits are strong enough to justify institution despite clear concerns about inefficiency and duplication. *Fintiv*, Paper 15 at 15. Even plausible petitions may be denied where those concerns predominate. *Samsung Elecs. Co., Ltd. v. SiOnyx, LLC*, IPR2025-00065, Paper 16 at 19–20 (PTAB June 6, 2025). This Petition is not compelling.

The Petition's merits rise and fall on whether Palmatier qualifies as prior art. Palmatier is the primary reference in every ground. If it is not prior art, the Petition fails. Palmatier's status as prior art is disputed and turns on a threshold factual issue—whether Patent Owner conceived of the claimed inventions before Palmatier's December 19, 2011 effective date and diligently reduced them to practice before the '633 patent's October 25, 2012 priority date (Pet. at 4). That issue requires fact-intensive evidence regarding conception and diligence, and it

must be resolved before the Board can even reach the asserted grounds.[1] Patent Owner will elaborate on this issue more fully in its forthcoming POPR.

That threshold dispute is not unique to this Petition. Medtronic relies on Palmatier across multiple petitions challenging related patents in the same family. *E.g.*, *Medtronic, Inc. v. Moskowitz Family LLC,* IPR2026-00162, Paper 1 at 3-4; *Medtronic, Inc. v. Moskowitz Family LLC*, IPR2026-00216, Paper 1 at 3-4. In each instance, Palmatier's prior art status turns on the same underlying inventive activity—conception and diligence by the same inventors across closely related subject matter. The result is that the same threshold issue will be litigated repeatedly: across multiple IPRs and in the district court, based on the same core factual record.

Institution here would not simplify that dispute. It would multiply it. The Board would be required to resolve the same fact-intensive priority issue in parallel proceedings, while the district court addresses that same issue in the broader context of the asserted patent family. That duplication creates a risk of inconsistent outcomes and undermines the efficiency that AIA review is intended to provide.

[1] Patent Owner has already presented evidence of conception prior to Palmatier's effective date and diligent reduction to practice in a related proceeding involving a continuation of the '633 patent. *See, e.g.*, IPR2026-00162, Paper 9 at 5–67; Ex. 2024.

Petitioner's filing posture ensures that the same disputed Palmatier prior-art issue will be litigated repeatedly across multiple proceedings. Petitioner has advanced the same Palmatier-based prior-art theory across multiple petitions challenging closely related Moskowitz patents, filed in a staggered sequence over several months. The Board's Standard Operating Procedure recognizes that, where practicable, related AIA proceedings involving the same patent owner and related subject matter should be assigned to the fewest total judges to promote efficiency and consistency. Ex. 2013 at 12. But due to Petitioner's staggering of petition filings, multiple panels will have to independently grapple with the same disputed prior-art status, priority record, and technical background—an additional inefficiency that weighs against discretionary review in the absence of compelling merits.

This is not a case where strong merits overcome discretionary concerns. The asserted grounds depend on a disputed threshold issue that must be resolved before the merits can even be reached, and that same issue will be litigated repeatedly across parallel proceedings. The merits do not justify duplication—they create it. Factor 6 favors denial.

III. THE DIRECTOR SHOULD EXERCISE DISCRETION UNDER § 325(d) TO DENY INSTITUTION.

Discretionary denial is independently warranted under § 325(d). This Petition is built entirely on references the Office already had before it—Palmatier (Ex. 1057), Gordon (Ex. 1013), and Glerum (Ex. 1058). Pet. at 4-5.

Although Petitioner suggests Gordon and Glerum were overlooked due to being "cited in an IDS amongst 320 other references" (Pet. at 5), these references were also previously cited during prosecution of the '633 patent's parent: the '284 patent.[2] Palmatier was also cited, and actually applied in an anticipation rejection during prosecution of the '633 patent's parent. Ex. 1056, 146-148. Palmatier was expressly discussed with the Examiner and addressed in Applicant's response. *Id.* at 182-184, 195. Allowing institution would require the Board to revisit the same references already considered and evaluated by the Office multiple times.

Notably, the Examiner of the '633 patent—Examiner Negrelli (Ex. 1004 at 258)—was different from the Examiner of the '284 patent—Examiner Philogene (Ex. 1056 at 149). This means that two different examiners considered the references relied upon by Petitioner and allowed the claims over them. Petitioner now seeks yet another opportunity to address these same references. Section 325(d) exists to prevent precisely that result.

That history readily satisfies the first prong of *Advanced Bionics*. *Advanced Bionics, LLC v. Med-El Elektromedizinische Geräte GmbH*, IPR2019-01469, Paper 6 at 7–8 (PTAB Feb. 13, 2020). The burden thus shifts to Petitioner to show that the

[2] References considered in parent applications are carried forward and considered during continuation examination. MPEP § 609.02(II)(A)(2)

Office committed a material error apparent from the prosecution record. That is a demanding showing. It is not enough to reargue the same art, tell a different story about that art, or simply disagree with the Examiner's conclusion. *Id*. at 8–9; *Becton, Dickinson & Co. v. B. Braun Melsungen AG*, IPR2017-01586, Paper 8 at 17–18 (PTAB Dec. 15, 2017).

Petitioner does not make that showing. Its central theory is that "the Office erred in its analysis of Palmatier by relying on the wrong embodiments of Palmatier." Pet. at 5. But the prosecution record does not support that accusation. To the contrary, the record shows the Examiner of the '284 patent (Examiner Philogene) considered Palmatier as a whole, applied it, discussed the limitation now at issue, and still allowed the claims. The Examiner of the '633 patent (Examiner Negrelli) considered the prosecution of the '284 patent (parent) when examining the '633 patent (child) as required under standard examination practice.

The record of the '284 patent begins with Palmatier itself. The figure on the face of Palmatier is Figure 24—one of the very figures Petitioner now invokes. Ex. 1057, front page. Petitioner's theory thus depends on the premise that the Examiner somehow overlooked the embodiment displayed on the face of the reference. The prosecution record gives no reason to accept that premise.

The rejection points the other way. Examiner Philogene stated that Palmatier's disclosures were "best seen ***in at least*** FIGS. 17–21." Ex. 1056 at 146–

148 (emphasis added). "At least" matters. It shows the Examiner was not limiting the analysis to only Figures 17–21. It shows the Examiner was evaluating Palmatier more broadly and using those figures as illustrative support.

The prosecution history confirms that point even more directly. Examiner Philogene and Applicant specifically discussed the "slot" feature of Palmatier. Ex. 1056 at 195. That was not an abstract discussion of Palmatier. It was a focused discussion of the precise feature Petitioner now tries to revive through a different embodiment theory.

And Examiner Philogene had every opportunity to change course if Petitioner was right. The interview summary states that "[a]s to allowability, no agreement was reached." *Id.* In other words, the issue remained live. If Palmatier in fact disclosed the claimed slot through the alternative embodiment Petitioner now advances, the Examiner could have adopted that reading after the interview or after reviewing Applicant's response. The Examiner did not. Instead, after the interview and after receiving Applicant's response, Examiner Philogene allowed the '284 claims over Palmatier.

Examiner Negrelli reviewed Examiner Philogene's work, came to the same conclusion with respect to the '633 patent claims, and decided to reject the '633 patent claims based on U.S. Patent No. 6,102,950 ("Vacarro"). That is not material error; it is independent confirmation. The record does not show that either Examiner

misunderstood Palmatier, applied the wrong legal standard, adopted an unreasonably narrow claim interpretation, or made contradictory factual findings. It shows the opposite. Examiner Philogene evaluated Palmatier under the broadest reasonable interpretation of the claims, applied the reference in substance, discussed the "slot" limitation now in dispute, and concluded that Palmatier did not disclose the claims of the '284 patent—which Petitioner alleges to be similar to the claims of the '633 patent. Pet. at 5. Examiner Negrelli independently came to the same conclusion. Petitioner's mere disagreement with two examiners—and its attempt to reframe the same reference under a different narrative—does not amount to material error as a matter of law.

Petitioner's "wrong embodiment" theory is therefore not a showing of error. It is an invitation to reweigh the same reference and reach a different conclusion on the same limitation already considered by the Office. Section 325(d) does not permit that kind of hindsight second-guessing. And Petitioner's fallback references do not solve the problem; Gordon and Glerum were also before the Office. Granting institution would thus force the Board to spend additional resources reexamining art the Office already considered and, in Palmatier's case, actually applied in the '633 patent's parent. Section 325(d) is designed to prevent that redundancy. The Director should exercise discretion to deny institution.

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Director exercise discretion to deny institution.

Date: March 23, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL** and associated exhibits (Exhibits 2001-2013) were served electronically via e-mail on March 23, 2026, in their entireties on the following counsel of record for Petitioner:

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