

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

X CORP.,
Petitioner,

v.

SEARCH AND SHARE TECHNOLOGIES, LLC,
Patent Owner.

Case IPR2026-00244
Patent 10,180,952

PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL

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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Patent Owner's Amended Complaint, Dkt. 30, filed January 5, 2026 in <i>Search and Share Technologies, LLC v. X Corp.</i> , Case No. 1:25-cv-01540 (W.D. Tex.)
2002	Defendant X Corp.'s Motion to Stay Pending <i>Inter Partes</i> Review, Dkt. 37, filed February 25, 2026 in <i>Search and Share Technologies, LLC v. X Corp.</i> , Case No. 1:25-cv-01540 (W.D. Tex.)

I. INTRODUCTION

Patent Owner Search and Share Technologies, LLC (“Patent Owner”) respectfully requests discretionary denial of the Petition against U.S. Patent No. 10,180,952 (“the ‘952 Patent”). The ‘952 Patent demonstrates how small entities can successfully use the U.S. patent system. Long before social media giants dominated the internet, its inventors, John Shriber and Roman Zaks, were building the tools that made modern online sharing and discovery possible. Ex2001, ¶¶11-13.

That technology, covered by the ‘952 Patent, is being used unlawfully by Petitioner, and Patent Owner filed suit against Petitioner on Sept. 22, 2025. Following its receipt of Patent Owner’s District Court complaint, Petitioner X filed numerous motions in District Court and two Petitions before the Office. In a motion seeking a stay from the District Court pending the outcome of this IPR, Petitioner noted how the parties had not “engaged in claim construction” yet, and argued that the Office’s claim construction would simplify the dispute. Ex2002, 7 (arguing that IPR can simplify claim construction); *see also id.*, 5 (“a ruling on one patent may still be highly relevant to claim construction and other issues for the other patent.”).

But Petitioner’s IPR does not simplify any disputes concerning claim construction because its Petition actively avoids setting forth any position on how the claims of the ‘952 patent should be construed. Instead, the Petition declares, “Petitioner submits that no terms require construction for the purposes of this IPR.”

Pet., 10. Indeed, rather than following up on its promise to the District Court, Petitioner instead seeks to “reserve[] all rights to raise claim construction arguments in other forums.” Pet., 10 n.2.

This hide-the-ball approach to claim construction is exactly what 37 C.F.R. § 42.104(b)(3) and the Director's discretionary denial process seeks to avoid. Indeed, the Petition shows the hallmarks of the inefficiencies of such an approach. Instead of crisply presenting its theories, the Petition casts a broad net of “to the extent that” or “same extent” statements that place the burden of developing claim construction positions on the Office and Patent Owner. *See* Pet., 17, 35, 38, 53, 80, 86, 90, 93. Even Petitioner's expert provides no grounded standard of claim construction, other than attempting to forecast what the Board “needs” for claim construction. *See* Ex. 1002, ¶¶53-55. This behavior ignores the regulatory requirement for the Petitioner to state “[h]ow the challenged claim is to be construed,” as demanded by 37 C.F.R. § 42.104(b)(3) and absent from the Petition.

Accordingly, the Petition against the '952 patent should be denied on discretionary grounds. The IPR process should not be used to game the U.S. patent system as Petitioner has done with this Petition. It should not be used as a vehicle for a large entity to delay relief to a small entity. And it should not be used to allow a Petitioner to make promises in District Court concerning the PTAB's efficiencies in

claim construction and then ignore those promises (and the Office’s rules promoting those efficiencies).

Additional reasons support denial. The ‘952 Patent issued on January 15, 2019, and has been in force for over seven years. Further, the Petition’s substantive weaknesses, and its heavy reliance on expert testimony to fill prior art gaps, support denial. Finally, the Board should deny institution under 35 U.S.C. § 325(d) because Petitioner’s arguments rely on prior art that is substantially similar to art already considered and overcome during prosecution of the ‘952 Patent. A key limitation the Examiner found missing from the prosecution art—a user interface that automatically selects and displays a portion of third-party content based on user-configured settings—is absent from Petitioner’s references. Denial is proper here.

II. BACKGROUND

The ‘952 Patent is part of a family of related patents that have undergone extensive examination. The ‘952 Patent issued from U.S. Application No. 15/142,479 (the “‘479 Application”), which is a continuation of U.S. Application No. 13/420,503 (the “‘503 Application”), which issued as U.S. Patent No. 9,338,215 (the “‘215 Patent”). The ‘479 Application claims priority to U.S. Provisional Patent Application No. 61/452,595, filed March 14, 2011. A related continuation, U.S. Application No. 16/247,361 (the “‘361 Application”), issued as U.S. Patent No. 11,106,744 (the “‘744 Patent”). Across this prosecution history, the claimed

invention has been examined by multiple examiners and survived multiple rounds of rejection.

The '952 Patent is directed to a web-search system in which search results are generated based on user-provided input. When a user views web content in a main browser window, the user can submit an identification of that content together with user-generated content—such as keywords, tags, ratings, and comments—to a server through a user interface separate from the main browser window. The server subsequently stores and indexes the submission so that when another user performs a web search, the server provides search results affected by the submitted user-generated content.

Independent Claim 1 requires that “the first user interface automatically selects a portion of the 3rd party content and displays the portion of the 3rd party content within the first user interface based on settings received from the user via the user interface to display selected portions of the 3rd party content.” This limitation requires that the user interface automatically selects and displays a portion of the third-party content based on user-configured settings that control what content is displayed within the separate interface, and is not satisfied by systems that merely allow a user to manually select content to submit, or that display web content in a sidebar without automatic selection driven by user-defined display settings.

This distinction matters because the ‘952 Patent addresses a specific problem with conventional search engines. As the specification explains, the “process employed by typical search engines to generate search results may not accurately reflect the interest of users on the web.” EX1001, 1:30–32. The claimed invention provides a user-driven system where users interact with third-party web content through an intelligent interface that automatically curates and displays content based on their preferences—enabling efficient identification, indexing, and ranking that harnesses human judgment rather than algorithmic web crawling alone.

During prosecution of the ‘952 Patent, the Examiner rejected Claims 1–15 under 35 U.S.C. § 103 over Murdock (US 2009/0271388 A1) in view of Cierniak (US 2011/0161413 A1), and further in view of Uy (US 2010/0257184 A1) for certain dependent claims. EX1006, 69–87, 138–156. After the applicant filed a Request for Continued Examination with amended claims and substantive arguments, the Examiner specifically found that the prior art of record did not teach the limitation requiring the user interface to automatically select and display a portion of the third-party content based on settings received from the user. EX1006, 208–12.

III. PETITIONER’S CLAIM CONSTRUCTION BEHAVIOR WEIGHS IN FAVOR OF DENIAL

The Board’s regulations require that petitioners state “[h]ow the challenged claim is to be construed.” 37 C.F.R. § 42.104(b)(3). Further, when Petitioner sought a stay of the District Court proceeding, it noted to the District Court that the parties

had not “engaged in claim construction” and argued that the Office’s claim construction would simplify the dispute. Ex2002, 7 (arguing that IPR can simply claim construction); *see also id.*, 5 (“highly relevant to claim construction”). But no simplification will occur here because Petitioner actively avoids setting forth any position on how the claims of the ’952 patent should be construed. Instead, the Petition declares, “Petitioner submits that no terms require construction for the purposes of this IPR.” Pet., 10. Adding to Petitioner’s subterfuge before both the District Court and the Board, here Petitioner “reserves all rights to raise claim construction arguments in other forums.” Pet., 10 n.2. Rather than providing clarity on claim construction, Petitioner hides its cards.

As explained in the introduction, this approach to claim construction is exactly what 37 C.F.R. § 42.104(b)(3) and the Director’s discretionary denial process seeks to avoid. The Petition shows the hallmarks of these inefficiencies by peppering the Petition with “extent” statements that place the burden of developing claim construction positions on the Office and Patent Owner. *See* Pet., 17, 35, 38, 53, 80, 86, 90, 93. Even Petitioner’s expert provides no grounded standard of claim construction or opinion on claim construction. This behavior certainly offers no simplification to the District Court, and flatly ignores the regulatory requirement for the Petitioner to state “[h]ow the challenged claim is to be construed,” as demanded by 37 C.F.R. § 42.104(b)(3) and absent from the Petition.

The IPR process should not be used to game the U.S. patent system in the manner perpetrated by Petitioner. It should not be used as a vehicle for a large entity to delay relief to a small entity. And it should not be used to allow a Petitioner to make promises in District Court concerning the PTAB's efficiencies in claim construction and then ignore those promises (and the Office's rules promoting those efficiencies). The Petition should be denied.

IV. THE BOARD SHOULD DENY INSTITUTION UNDER 35 U.S.C. § 314(a)

Additional factors weigh in favor of denial, including settled expectations. The '952 Patent has also been in force for over seven years. The '952 Patent is also part of a family that has undergone extensive examination across three related applications, each reviewed by the same primary examiner over multiple prosecution cycles involving independent prior art searches and distinct grounds of rejection. The claims survived multiple rounds of rejection and were ultimately allowed after substantive consideration.

Moreover, as detailed in Section V below, the Petition does not address the examiner's reasons for finding the prior art insufficient, repackages art that fails to teach the same critical limitation the examiner found missing, and identifies no specific error in the examiner's reasoning. This weakness is an independent basis for discretionary denial. Further, the Petition's references fail to teach the same limitations the examiner found missing from the prosecution art. Rather than

acknowledging these gaps, the Petition relies heavily on Terveen's declaration to paper over them. This is expert gap-filling, not expert explanation of prior art disclosures, and also favors discretionary denial.

V. THE BOARD SHOULD DENY INSTITUTION UNDER § 325(d) BECAUSE THE PETITION RELIES ON PRIOR ART SUBSTANTIALLY SIMILAR TO ART CONSIDERED DURING PROSECUTION

A. Legal Standard

Under 35 U.S.C. § 325(d), the Board may deny institution when “the same or substantially the same prior art or arguments previously were presented to the Office.” The Board applies the two-step framework set forth in *Advanced Bionics, LLC v. MED-EL Elektromedizinische Geräte GmbH*, IPR2019-01469, Paper 6 (PTAB Feb. 13, 2020) (precedential). At step one, the Board asks whether the same or substantially the same art or arguments were previously presented to the Office. *Id.* at 8. At step two, the Board asks whether the petitioner has demonstrated that the Office erred in a manner material to the patentability of the challenged claims. *Id.* If the petitioner fails to show that the Office erred, the Director may exercise discretion not to institute review. *Id.* Where the petition's art is cumulative of art previously applied during prosecution, the Board considers the six non-exclusive factors set forth in *Becton, Dickinson & Co. v. B. Braun Melsungen AG*, IPR2017-01586, Paper 8 (PTAB Dec. 15, 2017) (precedential as to § III.C.5, first paragraph).

B. *Advanced Bionics* Step One: Substantially Similar Prior Art Was Previously Considered and Overcome During Prosecution

Petitioner's references, Malla (US 7,899,829 B1) (EX1003), Walther (US 2005/0216457 A1) (EX1004), and Smadja (US 2006/0069699 A1) (EX1005), are substantially similar to the prosecution art—Murdock (US 2009/0271388 A1), Cierniak (US 2011/0161413 A1), and Uy (US 2010/0257184 A1)—in every material respect. Each category of claim limitation addressed during prosecution maps directly to the same category of teaching that Petitioner now repackages through different references.

1. User Interface Separate from the Main Browser Window

In the Non-Final Office Action, the examiner rejected the independent claims under Murdock in view of Cierniak. The rejection was based in part on Murdock's disclosure of a user interface, separate from the main browser window, for interacting with web content. Murdock discloses a separate interface from the main browser window through which users can submit content-related information to a server. EX1006, 79–80. The examiner found that Cierniak disclosed a plug-in module for receiving user comments and indexing web documents. EX1006, 80–82. Petitioner's primary reference, Malla, teaches these same concepts. Malla discloses a bookmark management system operated through a browser plug-in in which users interact with web content through an interface separate from the main browser window, creating "intelligent bookmark[s]" that associate URLs with user-generated

metadata. EX1003, 9:32–39; Figs. 1, 3. Malla's interface enables users to tag, categorize, and submit web content to a server for indexing. EX1003, 11:1–17. This is the same type of user-driven content identification and submission that Murdock and Cierniak taught.

2. Server-Side Indexing Based on User Submissions

The examiner found that Murdock and Cierniak together disclosed server-side indexing of web content based on user submissions. Murdock's server receives user-submitted content identifications, (EX1006, 80), and Cierniak taught the indexing of web documents based on user submissions and annotations. EX1006, 80–82. Malla likewise discloses server-side indexing based on user submissions. Malla's server stores “intelligent bookmarks”—associations between URLs and user-selected categories and tags—in a server-side index. EX1003, 11:1–17. The server maintains an index that interlinks bookmarks based on topics and user-generated category, keywords, ratings, and other metadata to enable later retrieval by other users. *Id.*

3. Ranking and Rating Based on User Input

In the Non-Final Office Action, the examiner rejected the independent claims under Murdock in view of Cierniak, and further in view of Uy for the ranking-related dependent claims (then claims 3–5 and 10–12). EX1006, 83–86. In the Final Office Action, the examiner applied the three-reference combination—Murdock, Cierniak, and Uy—to all pending claims. EX1006, 143–153. Uy disclosed a system for rating-

based ranking in which user ratings and feedback influence search result rankings. EX1006, 83–86. The examiner found that it would have been obvious to incorporate Uy's rating-based ranking into Murdock and Cierniak's user-interactive system. *Id.*

Petitioner's references teach the same rating and ranking concepts. Walther discloses a system in which users provide ratings and annotations for web content, and the server uses these ratings to rank and reorder search results. EX1004, [0047], [0088], [0143], Fig. 9. This is the same rating-based ranking mechanism the examiner already evaluated when considering Uy—user ratings that drive server-side ranking of search results.

4. User Interface Automatically Selects and Displays Content Based on User Settings

A key limitation the examiner found missing from the prosecution art—a user interface that automatically selects and displays a portion of third-party content based on user-configured settings—is also absent from Petitioner's references.

After the examiner issued the Final Office Action maintaining the rejection of all claims under Murdock, in view of Cierniak, and further in view of Uy, the applicant filed a Request for Continued Examination and amended the independent claims to add the requirement that the user interface automatically selects a portion of the 3rd party content and displays the portion of the 3rd party content within the first user interface “based on settings received from the user via the user interface to display selected portions of the 3rd party content.” EX1006, 180–190. Following

this amendment, Examiner Mohammed R. Uddin (“Uddin”) conducted an updated prior art search across multiple databases—including EAST, Google, IEEE, and ip.com—and allowed the claims. EX1006, 208–212. The examiner’s Reasons for Allowance specifically stated that the prior art of record—Murdock, Cierniak, and Uy—did not teach or suggest this settings-based automatic selection and display feature in combination with the other claimed elements. EX1006, 209–211.

Petitioner contends that Malla’s automatic extraction of content during bookmark creation teaches the “automatically selects” element. Pet. at 23–25. But the examiner applied Murdock to this same “automatically selects . . . and displays” element and rejected the claims on that basis. EX1006, 79. Claim 1 was not allowed until the “based on settings” amendment was added. EX1006, 180–190, 208–212.

Petitioner also contends that Malla’s “Intelligent Bookmark Preview” displays extracted content within the bookmark interface, satisfying the “the portion of the 3rd party content within the first user interface” element. Pet. at 25–28. Here again, the examiner applied Murdock to this same element and rejected the claims on that basis. EX1006, 79. Malla’s display of extracted text and screenshots within a separate bookmark interface is substantially similar to the Murdock display functionality the examiner already evaluated.

Petitioner then argues that Malla’s “interface preferences” satisfy the very limitation that distinguished the claims over the prosecution art. Specifically,

Petitioner contends that Malla’s user-adjustable settings—such as enabling or disabling OCR (Optical Character Recognition) processing and configuring image capture scope—constitute “settings received from the user via the user interface to display selected portions of the 3rd party content.” Pet. at 28. This argument fails because it conflates two fundamentally different mechanisms: (1) interface configuration preferences that govern the scope of data extraction during bookmark creation—*how much* information, and (2) the claimed setting-based display mechanism that causes the user interface to autonomously select and present specific content portions from third-party content—*what* information.

Malla’s “interface preferences” govern whether OCR is applied or how much of the screen is captured at the moment of bookmark creation, not whether the interface autonomously presents selected portions of third-party content based on user-configured display rules. EX1003, 8:56–59; 9:12–21. Moreover, Malla’s system requires the user to affirmatively trigger bookmark creation before any extraction occurs. EX1003, 13:58–14:13; Fig. 10. The extraction is thus dependent on this user trigger—not on pre-configured settings that cause the interface to select and display content independently of user action in the moment.

Notably, Petitioner asserts Malla anticipates Claims 1–3. Pet. at 3. An anticipation ground requires that Malla disclose every limitation explicitly or inherently—including the settings-based automatic selection limitation the

Examiner found dispositive. But Petitioner relies on the same characterization of user-configurable preferences that Murdock’s and Cierniak’s systems also embodied, confirming that Petitioner has not presented materially different teachings. It has simply repackaged the same type of user-interactive extraction system under a different reference name.

Walther’s annotation system (used in Ground III) similarly fails to cure this deficiency. Walther’s annotation interface requires the user to manually activate a “Save This” button to open an editing interface for a selected page. EX1004, [0113], [0118], [0119]; Fig. 8 (step 802: “User Activates ‘Save This’ Button”). This manual initiation is no different from the user-triggered interaction in the prosecution art. Smadja addresses only conventional server architecture—processor and memory components—without addressing the claimed automatic content selection. EX1005, [0082], [0083], Fig. 1. Neither individually nor in combination do these references cure the same gap the examiner identified in Murdock, Cierniak, and Uy.

The following chart summarizes the parallels between the prosecution art and the petition art:

Claim Limitation	Prosecution Art (Murdock/Cierniak/Uy)	Petition Art (Malla/Walther/Smadja)
User interface separate from	Murdock/Cierniak: browser plug-in module providing	Malla: bookmark interface separate from browser

main browser window	separate interface (EX1006, 79–80)	window (EX1003, 9:30–35; Figs. 1, 3)
Server-side indexing of user-identified content	Murdock/Cierniak: indexing web content based on user submissions (EX1006, 80–82)	Malla: server stores intelligent bookmarks in index (EX1003, 7:6–22, 10:15–25)
Rating/ranking based on user input	Uy: ranking documents based on user ratings (EX1006, 83–86)	Walther: reranking using user ratings (EX1004, [0047], [0088], [0143]; Fig. 9)
User interface automatically selects and displays content based on user settings	NOT TAUGHT Murdock/Cierniak/Uy require manual user trigger; the Final OA maintained rejections under all three references, and all claims were allowed only after amendment adding this limitation; the Reasons for Allowance confirm the	NOT TAUGHT Malla's "interface preferences" govern extraction scope at bookmark creation, not autonomous display based on pre-set display rules; Walther requires manual

	combination does not teach settings-based autonomous display (EX1006, 143–153, 209–212)	“Save This” activation. (EX1004, Fig. 8, step 802) Smadja addresses server architecture only. (EX1005, [0082], [0083], Fig. 1)
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As this chart demonstrates the key limitation the examiner found missing from the prosecution art—a user interface that automatically selects and displays content based on user-configured settings—is also absent from Petitioner’s references. Step One of the *Advanced Bionics* framework is satisfied.

C. *Advanced Bionics* Step Two: Petitioner Has Not Demonstrated Material Error by the Office

The burden then shifts to Petitioner to demonstrate that the Office erred in a manner material to patentability, namely that the Office’s analysis was flawed in a way that affected its patentability determination. *Advanced Bionics*, Paper 6 at 10. Petitioner cannot meet this burden.

Here, the Examiner independently examined the claims of the ‘479 Application, issued rejections based on Murdock, Cierniak, and Uy, considered substantive arguments from the applicant, conducted an updated prior art search across multiple databases (including EAST, Google, IEEE, and ip.com), *see*

EX1006, 213–214, and ultimately concluded that the claims were patentable. The examiner's determination that the prior art did not teach a user interface that automatically selects and displays content based on user settings was a reasoned judgment entitled to deference. Petitioner's Petition identifies no specific error in that reasoning. Instead, it simply asserts that different references—which teach the same concepts—satisfy the limitation.

Additionally, the Terveen expert declaration does not establish material error. Terveen applies the same analytical framework—mapping user-interactive search and ranking features from prior art references onto the claim limitations—that the examiner evaluated when considering Murdock, Cierniak, and Uy. The fact that Terveen uses different specific references does not constitute evidence that the Office erred. Expert testimony alone cannot demonstrate Office error. *Becton, Dickinson*, Paper 8 at 28. Terveen's assertion that Malla's extraction preferences satisfy the “automatic selection” limitation is simply a disagreement with the examiner's claim interpretation—not evidence of examiner error.

Finally, the procedural history of the '952 Patent family further undermines any claim of examiner error. The '952 Patent is part of a family that includes the '744 Patent and the '215 Patent, which issued from applications that underwent multiple rounds of examination. The '479 Application that issued as the '952 Patent and the '503 Application that issued as the '215 Patent were examined by the same

examiner, Examiner Uddin. In the '479 Application, as in the '361 Application, the Examiner found that prior art teaching user-interactive search features with separate interface elements, server-side indexing, and rating-based ranking did not render the specific claimed combination obvious. This consistent handling and review by the Examiner confirms that there was no material error. The relevant inquiry under *Advanced Bionics* is whether this Petitioner has shown error in the examination that resulted in the '952 Patent, and Petitioner cannot do so here.

D. Application of the *Becton, Dickinson* Factors

1. Factors (a) and (b): Similarities and Cumulative Nature of the Art

As demonstrated by the comparison chart above, Petitioner's references—Malla, Walther, and Smadja—are cumulative of the prosecution art—Murdock, Cierniak, and Uy—with respect to user-interactive web content identification through separate interfaces, server-side indexing based on user submissions, and rating-based ranking. And neither set of references teaches the critical automatic content selection limitation that was dispositive during prosecution. Factors (a) and (b) favor discretionary denial.

2. Factors (c) and (d): Extent of Evaluation During Examination and Overlap of Arguments

The prosecution art was not merely cited on an Information Disclosure Statement—it was the basis for two substantive rejections by the examiner. The examiner rejected Claims 1–15 as obvious over Murdock in view of Cierniak and

further in view of Uy in both a Non-Final and Final Office Action, EX1006, 79–86, 143–154, then evaluated the applicant's response arguments and made a reasoned determination that the prior art did not teach the automatic content selection limitation, EX1006, 209–212.

Both sets of art present the same question: whether systems that require manual user interaction to identify and submit content satisfy the claim limitation requiring a user interface that automatically selects and displays content based on pre-configured user settings. The Examiner concluded “No.” Petitioner asks the Board to contradict the Examiner using references that present the same manual-interaction architecture. Factors (c) and (d) favor discretionary denial.

3. Factors (e) and (f): Whether Petitioner Showed Examiner Error and Whether Additional Evidence Warrants Reconsideration

Petitioner has not identified any specific error in the examiner's reasoning. The Petition does not allege that the examiner misunderstood Murdock, Cierniak, or Uy, misapplied the law, or overlooked a material disclosure. Instead, the Petition simply presents different references that teach the same concepts and improperly uses expert testimony where the references fall short. Expert testimony alone not establish examiner error, particularly where the expert applies the same analytical framework already evaluated during prosecution. *Becton, Dickinson*, Paper 8 at 28.

The Petition's references are drawn from the same technological field and time period as the prosecution art. They disclose the same general concepts. They fail to teach the same critical limitation. Factors (e) and (f) favor discretionary denial.

In sum, all six *Becton, Dickinson* factors support discretionary denial. This is precisely the type of case those factors were designed to address: a Petition that repackages art cumulative of that already vetted by the Office, without identifying error or providing sufficient justification for a second look.

E. Policy Considerations Under 35 U.S.C. § 325(d)

Congress enacted § 325(d) to prevent serial challenges based on art the Office already evaluated. The Federal Circuit has cautioned against such Monday morning quarterbacking of examination decisions. *See Sciele Pharma*, 684 F.3d at 1260 (noting the “high burden of proof created by the necessary deference to the PTO”). The fact that Petitioner has assembled yet another set of references teaching the same concepts that were already found to be insufficient—and has done so with the assistance of a paid expert—does not establish that the examiner erred. It underscores that the claimed invention represents a non-trivial advance over the prior art.

VI. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board deny institution of inter partes review of the '952 Patent.

IPR2026-00244 Patent Owner's Request for Discretionary Denial

Dated: April 27, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing document was served via email, by consent, to Petitioner by serving the correspondence email addresses of record as follows:

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Dated: April 27, 2026

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