

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAGEMCOM BROADBAND SAS,

Petitioner

v.

ENTROPIC COMMUNICATIONS, LLC,

Patent Owner.

IPR2026-00263

Patent No. 11,785,275

PETITIONER'S SUPPLEMENTAL DISCRETION OPPOSITION

Petitioner's Updated Mandatory Notices ("Notices"), filed on June 15, 2026 (Paper 15), entirely moot an argument made by Patent Owner in its Discretionary Denial Brief. Patent Owner had argued that the Petition should be discretionarily denied because Petitioner had not identified an alleged investor, Charterhouse Capital Partners LLP, as a real party in interest ("RPI") (Paper 12, 14-16).

To moot this argument, Petitioner's Notices now identify as potential RPIs every Charterhouse entity with any direct or indirect ownership in Petitioner, as well as the specific Charterhouse entity that Patent Owner identified. (Paper 15, 1-2.) Petitioner identified this long list of investors not because it believes that any actually qualify as RPIs, but out of an abundance of caution and to entirely eliminate this issue from this IPR.

None of the identified Charterhouse entities are subject to a time bar because Patent Owner served Petitioner on June 16, 2025 (Ex. 1136), less than a year before Petitioner updated its Notices. *See* U.S.C. § 315(b); *see also Curium US LLC v. Universität Heidelberg, et al.*, IPR2025-01582, Paper 11 at 2-3 (Feb. 25, 2026) (informative). The Notices remove any need for the Office to divert or expend additional resources deciding this RPI issue. *Magnolia Medical Techs., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 at 2-3, 6-7 (May 14, 2026) (precedential).

Dated: June 22, 2026

Respectfully submitted,

/ Jessica Kaiser /

Jessica Kaiser

Reg. No. 58,937

Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of **PETITIONER'S SUPPLEMENTAL DISCRETION OPPOSITION** was served upon the below listed counsel by electronic mail:

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