

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAGEMCOM BROADBAND SAS,
Petitioner,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2026-00263
Patent 11,785,275

**PATENT OWNER'S REPLY TO
PETITIONER'S SUPPLEMENTAL DISCRETION OPPOSITION**

TABLE OF AUTHORITIES

Page(s)

STATUTES

35 U.S.C. § 312(a)(2).....1

Sagemcom argues that its Updated Mandatory notices adding several Charterhouse entities “entirely moot[s]” its failure to identify all RPIs. Supp. Brief, 1; Discretionary Denial Brief, 14–16. Sagemcom’s attempt to cure the issue is untimely and does not resolve the issue.

The statute required Sagemcom to identify all RPIs in the petition. *See* 35 U.S.C. § 312(a)(2). Patent Owner expressly raised Petitioner’s failure in its Discretionary Denial Brief, filed April 27, 2026. Despite the ample lead time, Petitioner did not disclose these entities in its Opposition filed May 26, 2026 and chose to wait another three weeks, until the day before the one-year time bar expired.

And Petitioner’s carefully worded disclosure only identifies “every *Charterhouse entity* with any direct or indirect ownership in Petitioner.” Suppl. Brief, 1. Petitioner does not even represent that the Updated Mandatory Notices identify all RPIs, or that no other entities fund, direct, control, or benefit from the Petition. That is not a cure. An incomplete disclosure filed on the eve of the time bar does not retroactively make the Petition compliant with § 312(a)(2). Petitioner cannot “moot” an RPI challenge while preserving its ability to deny that it has identified all RPIs. The defect therefore remains live and supports denial.

Respectfully submitted,

/ Kenneth J. Weatherwax /

Parham Hendifar (Reg. No. 71,470)
Nathan Lowenstein, *pro hac vice* to be filed
Kenneth J. Weatherwax (Reg. No. 54,528)
LOWENSTEIN & WEATHERWAX LLP

Date: June 23, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date signed below:

**PATENT OWNER'S REPLY TO
PETITIONER'S SUPPLEMENTAL DISCRETION OPPOSITION**

The names and addresses of the parties being served are as follows:

Jessica Kaiser
Amanda Tessar
Tyler Knox

kaiser-ptab@perkinscoie.com
Tessar-ptab@perkinscoie.com
Knox-ptab@perkinscoie.com
Sagemcom-Entropic-IPR@perkinscoie.com

Respectfully submitted,

/ Michael Cosley /

Michael Cosley

Date: June 23, 2026