

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Meishan CRRC Fastening System Co., Ltd.

Petitioner,

v.

Howmet Aerospace Inc.

Patent Owner

IPR2026-00268
U.S. Patent No. 11,885,358

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

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EXHIBIT LIST

Exhibit	Description
1031	
1032	Declaration of Zuo Zongyang (“Zongyang Decl.”)
1033	The 2016 Statistical Bulletin on Party Membership in the Communist Party of China (Original Chinese)
1034	The 2016 Statistical Bulletin on Party Membership in the Communist Party of China (English Translation)
1035	Translation Certification for The 2016 Statistical Bulletin on Party Membership in the Communist Party of China
1036	International Patent Application WO2004/102016 (“Kleinman”)
1037	Howmet Aerospace Inc.’s Patent Owner Preliminary Response in IPR2025-01581

I. INTRODUCTION

Howmet Aerospace Inc.’s (“Howmet”) Request for Discretionary Denial (“Request”) should be denied, and the Director should proceed to consider the merits of Meishan CRRC Fastening’s (“Meishan Fastening”) Petition for *inter partes* review (“IPR”) of U.S. Patent No. 11,885,358 (“the ’358 Patent”).

Institution is especially appropriate because the Petition presents materially different prior art and arguments and demonstrates the Challenged Claims were allowed based on substantial examiner error.

First, the Petition identifies every real party in interest (“RPI”). This Petition arose from a dispute between Howmet and Nextpower Inc. (“Nextpower”)—a U.S.-based energy company identified as an RPI in the Petition. Howmet’s reliance on *Tianma* is misplaced because its threshold premise, that the Chinese government is purportedly an RPI, is based on unsupported speculation. Instead, the record shows that Meishan Fastening—not its parent entities, the government, SASAC, or General Party Branch—has sole authority over this IPR proceeding and further authorized, funded, directed, and now controls this IPR. Howmet asks the Director to adopt a *per se* rule that every indirectly state-owned enterprise has the government as an RPI. Such a determination would effectively close the Board’s doors to broad swaths of entities including many U.S. companies.

Second, this is the first IPR ever filed by Meishan Fastening, and it advances

novel prior art and invalidity arguments. Howmet never conducts the analysis required by *Advanced Bionics* and does not address Ground 5 at all. Rather than comparing the asserted prior art and arguments to those previously presented to the Office, Howmet asserts that Kleinman—an IDS-cited reference—is interchangeable with Corbett 2018 based solely on an overbroad interpretation of a parenthetical in a different IPR petition, a reading the Board never adopted.

Third, multiple discretionary considerations favor institution: (i) there is no parallel proceeding; (ii) Meishan Fastening’s stipulation eliminates any future duplication concern; (iii) there are no settled expectations; (iv) Meishan Fastening acted reasonably in defending itself and its [REDACTED]; and (v) the Challenged Claims were allowed based on an unclaimed feature.

Finally, Howmet’s request for a second round of discovery rests on mere speculation that additional evidence might exist, and should be denied.

II. FACTUAL BACKGROUND

A. Howmet Initiated this Dispute.

This dispute arises from a [REDACTED]
Nextpower Inc. (f/k/a Nextracker Inc.)—the U.S.-based energy company identified as an RPI in this Petition. EX1031. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 1, 3. According to Howmet, [REDACTED]

[REDACTED] *Id.*

[REDACTED] *Id.*

[REDACTED]

[REDACTED]

EX2004 at 2. [REDACTED]

[REDACTED]

[REDACTED] *See id.* [REDACTED].

Nextpower followed up with a [REDACTED]. *Id.* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 1–2. Around the same time, [REDACTED]

[REDACTED] EX1032 ¶ 7.

B. Meishan Fastening Decides to Authorize the Preparation and Filing of the Petition Challenging the '358 Patent.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] and resolving the dispute outside

of district court litigation. *Id.* ¶¶ 7–13. [REDACTED]

[REDACTED]

[REDACTED]. *Id.* ¶¶ 8–9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. *Id.* ¶ 9. [REDACTED]

[REDACTED]

[REDACTED]. *Id.* ¶ 9; EX2006

at 41.¹ Meishan Fastening held no other meetings regarding the IPR Petition before it was filed. EX1032 ¶ 11. Before the [REDACTED]

[REDACTED], Meishan Fastening had not generated any other approval documents proposing or requesting the filing of an IPR petition. EX1032 ¶ 11.

Counsel for Meishan Fastening prepared and, on February 20, 2026, filed the Petition challenging the '358 Patent. Pet.; EX1032 ¶ 10. The Petition lists Nextpower as an RPI. Pet. 3. Although CRRC Meishan Co., Ltd. (“CRRC Meishan”)—Meishan Fastening’s immediate parent company—was not involved in preparing or filing the Petition, the Petition nevertheless identified CRRC

¹ Pincites to Exhibit 2006 refer to the page corresponding to the Bates number, i.e., “EX2006 at 41” is shorthand for “EX2006 at MEISHANFASTENING_000041.”

Meishan as an RPI out of an abundance of caution based solely on its corporate relationship. *Id.*; EX1032 ¶¶ 12–13. The Petition is the first time Meishan Fastening has ever filed an IPR. EX1032 ¶ 9.

Meishan Fastening independently retained, directed, and paid the legal fees of its counsel for this IPR. *Id.* ¶ 10; EX2006 at 53–56. No other entity reimbursed Meishan Fastening those legal fees. EX1032 ¶ 10. At no point did CRRC Meishan, CRRC Corporation Limited, CRRC Group Co., Ltd., SASAC, or the Chinese government prepare, fund, direct, control, propose, or otherwise influence either (1) the decision to authorize the preparation and filing of the Petition, whether at the [REDACTED] or at any other time, or (2) the preparation or filing of the Petition itself. *Id.* ¶¶ 12–13.

III. THE CHINESE GOVERNMENT IS NOT AN RPI AND NO UNNAMED RPI EXISTS.

Howmet’s *Tianma* argument fails because it conflates indirect state ownership and general corporate governance with being a real party in interest. *Tianma* does not hold that every company with an upstream ownership connection to a foreign sovereign is barred from seeking AIA review. *Tianma Microelectronics Co. v. LG Display Co.*, IPR2025-01579, Paper 12 at 9–10 (Director Mar. 18, 2026) (precedential). Indeed, *Tianma* held that percentage ownership is “not necessarily dispositive” of the RPI inquiry. *Id.* at 8 n.6, 9.

Meishan Fastening alone possessed authority over this IPR proceeding and its filing. Moreover, the undisputed contemporaneous evidence establishes that Meishan Fastening—not SASAC, not any unnamed parent entity or shareholder, and not the Chinese government or any Communist Party organization—actually prepared, funded, and controls this Petition.

A. Meishan Fastening Alone Possessed Authority to Decide Whether to File and Conduct this IPR.

Howmet’s argument rests on a legally insufficient inference—that, because Meishan Fastening is part of the CRRC corporate family and its [REDACTED], some foreign-government entity must have had the ability to control this IPR. Req. 6–10. *Tianma* does not create a categorical rule that every company within a state-owned enterprise group is ineligible to file an IPR. Nor does it hold that ordinary corporate ownership, standing alone, makes every upstream entity, shareholder, Party Organization, or government body an RPI. To the contrary, *Tianma* confirms that percentage ownership is “not necessarily dispositive” of the RPI inquiry, and that the relevant question is whether the alleged unnamed party funded, directed, controlled, or had the ability to control the challenged petition. Paper 12 at 8 n.6, 9.

First, [REDACTED]
[REDACTED]. EX2006

at 20–38. They provide that Meishan Fastening [REDACTED]

[REDACTED]

[REDACTED]

EX2006 at 22 (Art. 8) (emphases added). Meishan Fastening [REDACTED]

[REDACTED] *id.* at 29 (Art. 28) (emphasis added), and

[REDACTED] *id.* at 32 (Art. 45)

(emphasis added). Those are not mere formalities; they confirm [REDACTED]

[REDACTED]

Here, the instant IPR proceeding is a foreign *legal* affair asserted as a
defense to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 22 (Art. 8); EX1032 ¶¶ 3, 7, 10.

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 22 (Art. 4). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 28–29 (Art. 26). [REDACTED]

[REDACTED]
[REDACTED] *Id.* at 29–30 (Art. 29).

Those provisions are directly relevant to the “ability to control” question.

Meishan Fastening treats [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] EX1032 ¶ 5. Meishan Fastening does not assign management or oversight of foreign legal proceedings to any shareholder, parent entity, government entity, or Party Organization. *Id.* ¶¶ 5–6. And no corporate governance document gives any such entity authority to approve, direct, require, or veto Meishan Fastening’s decision to file an IPR, direct the contents of an IPR filing, select or supervise counsel or experts, or direct litigation strategy. *Id.* ¶ 6.

Second, while Howmet principally relies on Meishan Fastening’s corporate diagram, Req. 5–6, ownership, without more, does not decide RPI status. *Tianma* itself confirms that “percentage ownership (whether greater or lesser than 10%) is not necessarily dispositive of the RPI inquiry.” *Tianma*, Paper 12 at 8 n.6. That principle is consistent with longstanding Board precedent holding that a parent–subsidiary relationship, including majority ownership, does not automatically make the parent an RPI. *Puzhen Life USA, LLC v. ESIP Series 2, LLC*, IPR2017-02197,

Paper 24 at 8 (PTAB Feb. 27, 2019); *Tesco Offshore Servs., Inc. v.*

Weatherford/Lamb Inc., IPR2018-01308, Paper 19 at 20 (PTAB Dec. 10, 2018).

In reality, the corporate diagram highlights why Howmet's theory is overbroad. Only CRRC Meishan Co., Ltd.—identified by the Petition as an RPI out of an abundance of caution—is Meishan Fastening's direct parent. Pet. 3. But Howmet relies on a multi-link chain for its theory of state control: [REDACTED]

[REDACTED] sits several levels above Meishan Fastening through additional corporate entities. Req. 5–7. An indirect economic interest does not show SASAC or any other entity has the ability to control this IPR.

Accepting Howmet's argument would effectively close the Board's doors to virtually all Chinese companies. But the implications would not stop there. Governments around the world hold controlling or substantial ownership interests in major commercial enterprises: Singapore owns many of its largest publicly traded companies through Temasek Holdings—a state-owned investment firm.² Norway is the controlling shareholder of leading commercial enterprises such as

² See Temasek, CORPORATE GOVERNANCE, *available at* <https://www.temasek.com.sg/en/about-us/corporate-governance>).

Equinor and Statkraft.³ France, South Korea, and other advanced economies likewise maintain significant ownership interests in strategic industries.

Howmet's theory would also sweep in U.S. entities with significant government involvement. Amtrak, for example, is a federally chartered organization whose Board includes the Secretary of Transportation and whose directors are appointed by the President with Senate confirmation. *See* 49 U.S.C. §§ 24302(a)(1). Yet none would suggest Amtrak's IPR decisions are automatically attributable to the United States merely because of its governance structure.

Third, the [REDACTED]

[REDACTED]. EX2006 at 23 (Art. 9), 26–27 (Art. 21). [REDACTED]

[REDACTED] *Id.* at 26–27 (Art. 21). However, [REDACTED]

[REDACTED] *Id.* at 28–30 (Arts. 26, 29). [REDACTED]

[REDACTED] they do not assign the Party

Branch approval, veto, funding, or litigation-control authority. *Id.* Indeed, [REDACTED]

³ *See* Equinor, THE NORWEGIAN STATE AS SHAREHOLDER, *available at* <https://www.equinor.com/about-us/the-norwegian-state-as-shareholder>.

[REDACTED]
[REDACTED] *Id.* at 30 (emphasis added).

The undisputed factual record confirms the same point in practice. [REDACTED]
[REDACTED]

[REDACTED] EX1032 ¶¶ 14–15. It did not direct, request, propose, approve, authorize, veto, or fund Meishan Fastening’s decision to prepare or file this Petition. *Id.* It did not oversee meetings concerning this IPR, communicate instructions concerning this IPR, review or approve the Petition before filing, select or supervise counsel or experts, select prior art or legal arguments, or otherwise direct the preparation, authorization, or filing of this IPR. *Id.* [REDACTED]

[REDACTED] *Id.*; EX2006 at 28–30 (Arts. 26, 29).

Moreover, public information indicates that Party organizations are a common feature of Chinese companies, including approximately 67.9% of private and non-state-owned enterprises. EX1033. If the mere existence of a Party Branch or generalized Party-governance language were enough to establish control, then a substantial majority of Chinese private enterprises would be presumed government-controlled for PTAB purposes. *Tianma* requires a petitioner-specific RPI inquiry, not a categorical bar based on corporate organization.

B. The Undisputed Evidence Shows that Meishan Fastening Alone Decided, Funded, and Directed this IPR.

Meishan Fastening—not CRRC Meishan Co., Ltd., CRRC Yangtze Co., Ltd., CRRC Corporation Limited, CRRC Group Co., Ltd., SASAC, or any government or Communist Party entity—authorized, prepared, funded, and controls this Petition and IPR proceeding. *See supra* § II.B; EX1032 ¶¶ 7–13.

Contemporaneous evidence confirms that, on [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EX2006 at 41; EX1032 ¶¶ 8–10. The attendees were Meishan Fastening's [REDACTED]

[REDACTED]. EX2006

at 41; EX1032 ¶ 8. [REDACTED]

[REDACTED]

[REDACTED] EX2006 at 41; EX1032 ¶ 8. None of the entities identified in

Howmet's Request had authority over this IPR. EX1032 ¶¶ 11–13.

Meishan Fastening held no other meeting regarding the Petition before it was filed, and there is no document proposing or requesting that SASAC, any upstream entity, or any government or Communist Party organization authorize the filing of the Petition. *Id.* ¶ 11. Meishan Fastening alone ultimately decided to

prepare and file the Petition to protect its commercial interests. *Id.* ¶¶ 7, 10.

Nor did any upstream parent, SASAC, or the Chinese government participate in the preparation or filing of the Petition. [REDACTED] [REDACTED] were employed by Meishan Fastening. *Id.* ¶ 8. No representative of CRRC Meishan, CRRC Yangtze, CRRC Corporation, CRRC Group, SASAC, or the Chinese government selected counsel, prior art, grounds, or experts, reviewed drafts, funded the Petition, or directed any litigation strategy. *Id.* ¶ 13. Meishan Fastening itself retained and paid counsel for this proceeding. *Id.* ¶ 10.

Tianma asks who is behind the petition—who funds it, directs it, and has the ability to control it. The answer here is Meishan Fastening.

IV. THE PETITION PRESENTS ART AND ARGUMENTS THAT ARE MATERIALLY DIFFERENT.

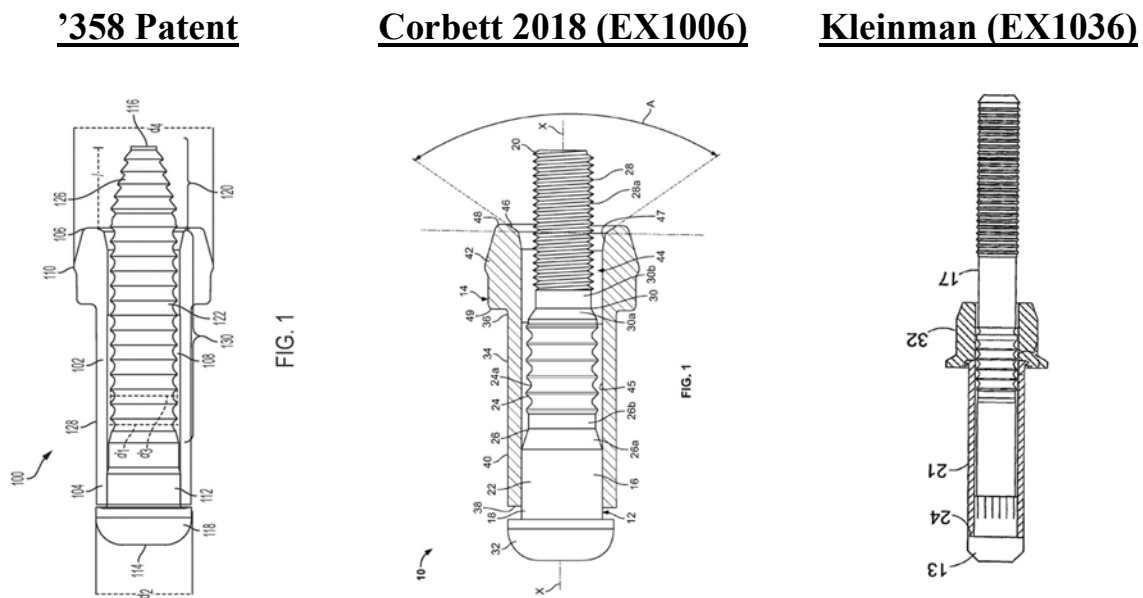
A. Howmet’s Interchangeability Theory Is Contrary to the Record, *Advanced Bionics*, and Its Own Prior Positions.

Howmet’s request rests on a flawed premise: that a *different* petitioner, Stanley, previously treated Corbett 2018 as interchangeable with a *different* reference, Kleinman, in a *different* petition, such that Corbett 2018 should now be deemed the same or substantially the same prior art previously presented to the Office. Req. 11–13. Howmet’s theory fails for several reasons.

First, Howmet fails to perform the analysis required by *Advanced Bionics v. Med-El Elektromedizinische Geräte GmbH*, IPR2019-01469, Paper 6 at 7–10

(PTAB Feb. 13, 2020) (precedential). Nowhere does Howmet discuss the similarities and material differences between the asserted art and purportedly previously presented art, the cumulative nature of the asserted art, or the extent of overlap between the prior arguments and the instant Petition. *Id.* at 9–10.

Second, contrary to Howmet’s argument, *id.* 11–13, two references do not become substantially the same prior art merely because they allegedly fail to disclose the same limitation. *See Wolfsped, Inc. v. The Trustees of Purdue Univ.*, IPR2022-00761, Paper 13 at 6–8 (Director Mar. 30, 2023) (vacating § 325(d) denial where Board failed to adequately consider material differences). Here, Corbett 2018 and Kleinman differ materially on their face.



Corbett 2018—unlike Kleinman—is nearly identical to the '358 Patent’s blind fastener and directly anticipates Claims 1-3, 5-17, and 19-20. Pet. 23–42.

Corbett 2018 discloses a pull-type blind fastener having a deformable outer sleeve surrounding a mandrel with a shortened pull region configured for installation using its sleeve-head and puller alignment mechanism. Pet. 14, 29–32 (Corbett 2018’s pull region “is less than twice the major diameter of the mandrel”). By contrast, Kleinman is directed to a different architecture in which the “pull region” must protrude sufficiently beyond the collar to withstand “interference-fit” installation, while remaining accessible for subsequent tool engagement. EX1037 at 31–35. Howmet previously relied on those very features to distinguish Kleinman, arguing that “Kleinman’s design requires a sufficiently protruding tail to accommodate pre-installation contingencies” such as “hammer blows to the projecting tail end of the pin.” *Id.* at 33–35. Those are not immaterial variations; they are different structures serving different installation functions.

Third, Howmet’s contention that Corbett 2018 and Kleinman are “interchangeabl[e]” is improperly based solely on Stanley’s parenthetical shorthand—“Corbett (or Kleinman)” —in Stanley’s IPR petition. Req. 11–12. Nowhere did Stanley’s petition expressly state that Corbett 2018 and Kleinman are actually interchangeable for § 325(d) purposes. Moreover, the Board there never found Corbett 2018 and Kleinman duplicative, cumulative, or interchangeable.

Howmet’s argument also contradicts its own positions in the Stanley IPR. There, Howmet advanced materially different reasons why Brewer could not be

combined with each reference based on their different structures and principles of operation. EX1037 at 11–25 (Ground A), 31–38 (Ground C). Howmet relied on Corbett 2018’s sleeve-head geometry, internal aperture, and puller-face alignment mechanism, arguing that combining Brewer would “place the entirety of the pin tail . . . inside Corbett’s sleeve head cavity, preventing puller access.” *Id.* at 15; *see also id.* at 12 (Corbett 2018’s sleeve, head, aperture, and anvil “are purpose-built so that the puller 62 grips a substantial protruding length of the multi-groove pull portion 28a while the anvil 64 swages the head 42.”), 13 (“Corbett’s outer sleeve 14 must be present prior to installation”), 17 (“purpose-built”).

By contrast, Howmet relied on entirely different features from Kleinman—its protruding pin tail, pre-staked collar, hammer-blow installation, interference-fit contingencies, and axial-shift requirements. *Id.* at 32–38. Howmet argued that “Kleinman expressly teaches that . . . the fastener may need to withstand and transmit substantial axial forces via the protruding tail end of the pin 11 to overcome interference fits or misalignment,” *id.* at 33; emphasized “Kleinman’s explicit pre-installation requirements and its pre-staked collar 32 assembly,” *id.* at 36; and argued Kleinman requires “a projecting tail that protrudes sufficiently through a pre-assembled, three-point staked collar . . . to survive hammer blows and large axial seating forces.” *Id.* at 37. It cannot now argue interchangeability.

Fourth, Howmet ignores entirely Ground 5 in the Petition. Pet. 64–90.

Howmet does not discuss Sadri or Bobtail before concluding that “both prongs of Advanced Bionics are satisfied for all grounds” of the Petition. Req. 11–14.

B. The Petition Presents Materially Different Art and Corrects the Examiner’s Reliance on an Unclaimed Limitation.

Discretionary denial is also inappropriate based on the substantial examiner error here. *Advanced Bionics*, Paper 6 at 8-9; *Magnolia Med. Techs., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 at 8 (Director May 14, 2026) (precedential) (examiner error may outweigh other factors because “the central purpose of IPRs is to determine whether the patent at issue may have been improvidently granted”). The Examiner allowed the Challenged Claims after Howmet distinguished the prior art purportedly because the claimed “pull region” can remain intact after installation and reduce shock force during installation. EX1003 at 40–46. Yet no such limitations appear in the independent claims. *ABS Glob., Inc. v. Cytonome/St, LLC*, 84 F.4th 1034, 1041 (Fed. Cir. 2023) (reversing Board’s construction). The dependent claims recite blind fasteners that “do[] not comprise a breakneck groove”—a structure that allows the pull region to break off and not remain intact. Thus the independent claims can cover blind fasteners with or without breakneck grooves (remaining intact or not intact) under claim differentiation. *InterDigital Commc’ns, LLC v. Int’l Trade Comm’n*, 690 F.3d 1318, 1324 (Fed. Cir. 2012).

Howmet also misapplies *Ecto World, LLC v. RAI Strategic Holdings, Inc.*, IPR2024-01280, Paper 13 (May 19, 2025) (precedential as to § A). *Ecto* does not hold that every petition must be denied whenever the patent owner later identifies a *different* IDS reference and asserts that it is similar to the petition's art. Nor does *Ecto* require the Petition to discuss an IDS reference that a *different petitioner* suggests might be similar to asserted prior art. Rather, because Corbett 2018 was never applied during prosecution and the Petition presents materially different art and arguments than those considered by the Examiner, *Ecto* supports institution.

V. MULTIPLE DISCRETIONARY FACTORS FAVOR INSTITUTION.

Discretionary denial is especially unwarranted here, because multiple discretionary considerations favor institution. First, there is no parallel district court proceeding. *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 5 (PTAB Mar. 20, 2020) (precedential). Second, the broad stipulation here eliminates any future duplication concern and weighs strongly against denial. *See* Paper 17. Third, Howmet has no settled expectations in the '358 Patent, which issued only recently on January 30, 2024. *Cambridge Industries USA Inc. v. Applied Optoelectronics*, IPR2025-00434 et al., Paper 11 at 2. Fourth, Meishan Fastening acted within a reasonable amount of time after learning of [REDACTED] [REDACTED] *See supra* § II.A. Fifth, as detailed *supra* § IV.B, the Petition presents a material question regarding whether the Challenged Claims were

allowed based on an unclaimed feature. *Magnolia Medical*, Paper 17 at 8. The Petition follows the Director’s discretionary denial guidance. Referral would further the AIA’s goal of efficiently resolving patentability disputes.

VI. HOWMET’S ATTEMPT TO COMPEL FURTHER DISCOVERY SHOULD BE REJECTED.

Howmet’s request to compel a second round of additional discovery and for a renewed discretionary-denial brief should be denied for several reasons.

First, Meishan Fastening fully complied with the Board’s Discovery Order by producing documents “relating to or sufficient to identify any connection or relationship” among specified entities, and documents “relating to or sufficient to show” foreign-government ownership, control, or ability to control. That production included corporate-relationship information, governance documents, and the [REDACTED] governing the decision to file this IPR. Req. 5–8, 15. Howmet’s repeated reliance on those documents confirms it received sufficient information to frame the RPI issue.

Second, Howmet’s dissatisfaction with the quantity of documents is not a basis for further discovery in an IPR. Req. 15 (arguing only that the “small amount of evidence produced” suggests a “high likelihood” that additional evidence exists). The Board’s precedential decision in *Garmin* makes clear that “[t]he mere possibility of finding something useful, and mere allegation that something useful

will be found,” is insufficient. *Garmin Int’l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 26 at 6–7 (PTAB Mar. 5, 2013) (precedential).

Third, Howmet’s speculation that more documents might exist is exactly the type of fishing expedition that this Board has cautioned against. *Shenzhen Buxiang Network Tech. Co., Ltd. v. Ideal Time Consultants Ltd.*, IPR2021-00080, Paper 36, at 2, 6, 8 (PTAB Jan. 13, 2022). Howmet’s speculation is also unfounded. For example, Howmet complains that the [REDACTED] refers to the approval of an [REDACTED] and that no such [REDACTED] was produced, but the [REDACTED] refers to this IPR proceeding. Compare Req. 15 with EX1032 ¶ 9. Howmet speculates that additional “strategy meetings” may have occurred between [REDACTED] and the filing of the Petition. Req. 16 (“Were additional strategy meetings held?”). No such meetings exist. EX1032 ¶ 11. Howmet also complains it did not receive “information as to the employers of [REDACTED]” in the [REDACTED] [REDACTED]. Req. 16. That information is provided above. *Id.* ¶ 8.

Finally, allowing Howmet to file successive discretionary-denial requests whenever it speculates that “more information would be beneficial” would unfairly prejudice Meishan Fastening and undermine the streamlined nature of IPR.

VII. CONCLUSION

For the foregoing reasons, the Petition should be instituted.

Date: July 10, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document and supporting exhibits were served on July 10, 2026 on the following IPR counsel via e-mail:

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