

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

Case IPR2026-00268

Patent No. 11,885,358

**PATENT OWNER'S REPLY TO PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL OF INSTITUTION**

LIST OF EXHIBITS

Exhibit	Description
2001	CRRC Madeinmeishan Website
2002	CRRC Corporation – World Benchmarking Alliance
2003	CRRC 2024 Annual Report
2004	Aug. 13, 2025 Response Letter re Howmet (Confidential)
2005	Delaware Litigation – Exhibit C-1
2006	MEISHANFASTENING_000001 to MEISHANFASTENING_000060 (Confidential)
2007	SASAC “About Us” webpage
2008	Wikipedia for SASAC

I. INTRODUCTION

Howmet Aerospace Inc. (“Patent Owner”) submits this authorized Reply to its Request for Discretionary Denial (“Request”). Meishan CRRC Fastening System Co., Ltd. (“Meishan”) conceded in its opposition brief that it is majority owned by the Chinese government. *See* Petitioner’s Opposition to Patent Owner’s Request for Discretionary Denial (“Opposition”), Paper 19, 9. Thus, the instant IPR must be dismissed.

II. MEISHAN’S NEW EVIDENCE CONFIRMS THE CHINESE GOVERNMENT IS AN RPI

On May 7, 2026, Chief Judge Deshpande granted Patent Owner’s Motion for Additional Discovery. *See* Paper 12 (“Discovery Order”). Despite Chief Judge Deshpande’s broad discovery instructions, Meishan’s discovery response provided a mere 6 documents totaling less than 27 pages. The Opposition confirms Meishan failed to comply with the Discovery Order as Meishan now submits a new declaration from an alleged employee of Meishan (Ex. 1032) and a 2016 Bulletin (Ex. 1033). Failure to comply with the Discovery Order weighs in favor of discretionary denial—gamesmanship should not be rewarded.

Exhibit 1032 is an alleged Declaration by Zuo Zongyang. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Accordingly, Exhibit 1032 should be afforded little or no weight.

Exhibit 1032 is also a distraction—even if its allegations are true, it does not matter who at Meishan decided to file the IPR. What matters is the Chinese government owns and controls Meishan, making it an RPI. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Sun Pharmaceutical Industries, Inc. v. Biofrontera Inc.*, PGR2026-00021, Paper 12, 3. It is undisputed that the “**State-owned Assets Supervision and Administration Commission of the State Council**” (SASAC), a division of the Chinese government, **has the ability to control this IPR proceeding as the majority owner of Meishan**. (Request at 5, 7, 10.) Thus, as in *Sun Pharma.*, Director Squires should discretionarily deny Meishan’s petition. Indeed, the present circumstances are strikingly similar to *Tianma* as Meishan has merely provided “a conclusory declaration ... unsupported by relevant documents,” “insufficient to rebut Patent Owner’s credible arguments that Petitioner failed to name all RPis.” *Tianma v. LG Display*, IPR2025-01579, Paper 12, 9 (“*Tianma*”). The present situation is also a “recipe ripe for mischief” where “[o]paque investment structures [are] used by foreign adversaries to gain influence over, or access to, U.S. intellectual-property assets and proceedings.” (*Tianma* at 5.)

Meishan argues that “*Tianma* does not hold that every company with an **upstream ownership connection to a foreign sovereign** is barred from seeking AIA review.” Opposition, 5. However, this is not a mere “**upstream ownership connection**,” but a majority ownership by the Chinese government of Meishan. Meishan’s Opposition confirms that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The Chinese government does not have merely an “**indirect economic interest**” in Meishan. Rather, it is a **majority owner** of Meishan. As the majority owner, the Chinese government has the ultimate authority over all of Meishan’s activities.

Meishan argues that “*Tianma* itself confirms that ‘percentage ownership (whether greater or lesser than 10%) is not necessarily dispositive of the RPI inquiry.’” (Opposition, 8 (citing *Tianma* at 8, n. 6).) Meishan mischaracterizes *Tianma*. The cited portion of *Tianma* was an instruction for petitioners to identify any entities with 10% or more ownership of a petitioner. *Tianma*, 8, n. 6. Here, Meishan concedes that it is majority owned by an entity of the Chinese government, [REDACTED], yet it failed to disclose this entity.

Meishan argues that CRRC Meishan Co., Ltd. (“CRRC Meishan”) “was not involved in preparing or filing the Petition,” yet it concedes that CRRC Meishan is a real party-in-interest as they are a “parent company.” (Opposition, 4.) Similarly, all of Meishan’s parent companies, including [REDACTED], should have been identified as real parties-in-interest.

For the above reasons, Petitioner’s evidence is untimely, unpersuasive, and shows the instant IPR should be denied because the Chinese government is an RPI.

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Patent No. 11,885,358

Respectfully submitted,
GREENBERG TRAURIG, LLP

Date: July 20, 2026

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **PATENT OWNER'S REPLY TO PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL OF INSTITUTION** was served on the following counsel via electronic mail:

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