

**Opposition To Request For Discretionary Denial
U.S. Patent No. 12,231,703**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PINTEREST, INC.,

Petitioner,

v.

OPENTV, INC.,

Patent Owner.

Case No. IPR2026-00334

U.S. Patent No. 12,231,703

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

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I. INTRODUCTION

Pinterest is an American company that has designed and offers for sale web-based services in the United States. OpenTV is a subsidiary of “the Kudelski Group,” a Swiss Corporation, and Patent Owner’s named real party-in-interest in this proceeding. Kudelski Group, through its United States subsidiary “OpenTV,” has sued Pinterest for infringing the ’703 patent (the subject of this IPR) in the District of Delaware. Thus, this dispute is primarily between a foreign-based corporation (through its U.S. subsidiary, OpenTV) and an innovative, U.S.-based company that offers for sale web-based services in the United States.

The ’703 patent recently issued in 2025, so it does not benefit from any “settled expectations” that it is valid. To the contrary, “settled expectations” here weigh heavily in favor of Pinterest, because OpenTV gamed the PTAB’s preference for PGRs by staging its lawsuits. Kudelski Group, through its subsidiary OpenTV, sued Pinterest in 2024 for infringing four *unrelated* patents. OpenTV attempted to avoid the impact of a PGR by waiting until the *day the PGR window* expired to file a separate infringement suit on the ’703 patent. Thus, any settled expectations here weigh heavily in favor of Pinterest—not only is the ’703 patent less than two years old, Pinterest objectively and reasonably expected that OpenTV’s first suit would have included all patents OpenTV felt were infringing. Pinterest had no expectation

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that OpenTV would wait a year to assert newly-issued patents, or that it would strategically wait until Pinterest was prevented from filing a PGR.

For these reasons, discretionary denial is inappropriate in this case. Moreover, each of the remaining relevant factors weigh against denial.

First, institution is appropriate to cure the material errors committed by the examiner during prosecution of the '703 patent. During prosecution of the '703 patent's parent, the '193 patent, the examiner rejected then-pending claims as anticipated or obvious—these claims had complete overlap with the independent claims of the '703 patent. The applicant of the '193 patent overcame that rejection by adding narrow limitations which do not appear in the '703 patent. By contrast, the '703 patent did not face any Section 102 or 103 rejections, and recaptured claim scope that the examiner in the '193 patent prosecution had found to be anticipated or obvious. This proceeding should be instituted to correct this material error.

Second, the *Fintiv* factors heavily weigh against denial because trial is currently set for April 3, **2028**, nearly half a year after the latest the Final Written Decision would be due in this proceeding. The petition was diligently filed a little more than four months after the complaint was served, little discovery has occurred, and the parties have yet to exchange terms for claim construction. Patent Owner's Request ignores the early state of the parallel litigation and does not even make any merits arguments.

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Finally, the Patent Owner's other proceedings brought against Petitioner, involving different, unrelated patents that describe different technologies, some even in foreign countries, have no bearing on this proceeding. ***By Patent Owner's own tactics***, the '703 patent is the sole patent involved in the parallel litigation in Delaware, and that proceeding is still in its very early stages. Indeed, rather than amending its first district court complaint against Petitioner, Patent Owner deliberately waited to file a separate lawsuit asserting the '703 patent, avoiding the PGR window entirely. Patent Owner should not be permitted to benefit from a discretionary denial by arguing that its first lawsuit against Pinterest somehow has bearing here, yet simultaneously avoiding a PGR by tactically delaying months to file a separate lawsuit against Pinterest.

II. PETITIONER IS AN AMERICAN COMPANY WHO DEVELOPED THE ACCUSED PRODUCT WITHIN THE UNITED STATES

Petitioner Pinterest, Inc. is an American company that was founded in 2009 in San Francisco, California. While San Francisco continues to be Pinterest's headquarters and largest engineering hub, Pinterest has continued to expand throughout the United States, and now has a large engineering presence in New York and Seattle. In March 2010, Petitioner launched the social media service Pinterest, which continues to be Petitioner's core business and the source of nearly all of its revenue. Since its release, Pinterest has been almost entirely developed by Pinterest

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employees working within the United States. Pinterest is currently used by approximately 100 million Americans.¹

By contrast, Patent Owner OpenTV, Inc. is a fully-owned subsidiary of Kudelski SA, a Swiss corporation and Patent Owner's real party-in-interest. Paper 5. Patent Owner's complaint in the parallel litigation emphasizes this relationship—the complaint's description for OpenTV largely focuses on the works and products of Swiss-based Kudelski Group, including the works of its founder, Stefan Kudelski, a citizen of Switzerland. EX2001, ¶¶11-19, 26-32. For example, the complaint alleges that “OpenTV and *The Kudelski Group* companies have garnered a robust international portfolio of over 3,000 worldwide pending and issued patents,” that others have allegedly “acknowledged the commercial importance of *The Kudelski Group's* patent portfolio,” and that “*Kudelski's* inventions are now used to ... optimize content recommendation systems, enhance video streaming applications, and provide curated advertising recommendation and delivery functionality.” *Id.*

¹ See https://s204.q4cdn.com/369458543/files/doc_earnings/2026/q1/earnings-result/Q126-PressRelease.pdf at 2 (106 million monthly active users between the U.S. and Canada)

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Thus, even Patent Owner draws little distinction between itself and its Swiss real party-in-interest, Kudelski Group.

The Director has expressed concern about “computer industries” within the United States “hav[ing] moved overseas.” March 11, 2026 Memorandum at 1. The Director has also expressed concern about not “giv[ing] a tactical advantage to companies that neither manufacture in the United States, nor are making American manufacturing investment.” *Id.* at 2. As a result, the Director has stated it will consider as a discretionary factor “the extent to which any products accused of infringement in a parallel proceeding are manufactured in the United States.” *Id.* at 2. Here, Kudelski Group, a Swiss company, has effectively sued Pinterest for infringement through its US subsidiary OpenTV.² As discussed above, Pinterest’s products are developed, and continue to be developed in the United States, and it has almost 100 million American users. The Board thus has a significant interest in deciding the merits of this petition. Neither Kudelski nor its subsidiary OpenTV should be given a “tactical advantage” through discretionary denial, especially given the gamesmanship it engaged in to avoid a PGR.

**III. SETTLED EXPECTATIONS HEAVILY WEIGH AGAINST DENIAL
IN FAVOR OF INSTITUTION**

² Kudelski Group is not a named plaintiff in the parallel litigation.

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Patent Owner lacks any settled expectations of validity because the '703 patent was only recently issued, on February 18, 2025. Thus, PO “has not developed strong settled expectations that favor discretionary denial.” *See Cambridge Indus. USA, Inc. v. Applied Optoelectronics, Inc.*, IPR2025-00434, Paper 11 at 2-3 (June 26, 2025). In fact, the '703 patent's entire family is new—U.S. Patent Nos. 11,184,652 and 11,825,139 were issued in 2021 and 2023.

Patent Owner does not claim it otherwise has any other settled expectations of validity, nor could it. Patent Owner has never asserted the '703 patent, nor has Patent Owner ever attempted to license or commercialize the '703 patent. Patent Owner does not allege that it practices the '703 patent nor any related patent.

In fact, Petitioner formed settled expectations that Patent Owner would not assert infringement of the '703 patent. On November 27, 2024, Patent Owner filed a lawsuit against Petitioner asserting infringement of four unrelated patents directed to different technologies. Ex. 2001. By then, the Patent Office had already issued a Notice of Allowance of the '703 patent. Ex. 1004, 16 (Oct. 15, 2024 Notice of Allowance). The '703 patent would issue on February 18, 2025.

Patent Owner did not wait to file its initial lawsuit to include the soon-to-be-issued '703 patent. Nor did Patent Owner move to amend its first lawsuit when the '703 patent issued—indeed, Patent Owner filed its First Amended Complaint in the first lawsuit on the very same day the '703 patent issued. Instead, Patent Owner

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waited to file a new complaint asserting the '703 patent nine months after it issued—*the same day* that the post-grant review period expired.

Accordingly, Petitioner had formed settled expectations that Patent Owner would not assert the '703 patent. Patent Owner had every opportunity to include the '703 patent in its first lawsuit and declined to do so. Instead, Patent Owner allowed the first lawsuit to progress to an advanced state—where currently the parties have completed claim construction briefing, fact discovery is nearly done, and the Court has already decided a motion to dismiss and a motion for partial summary judgment—before deciding to assert the '703 patent. Petitioner therefore had the reasonable expectation that Patent Owner would not assert the '703 patent.

Patent Owner's delay in asserting the '703 patent was clearly an attempt to avoid a post-grant review. Yet the Board has consistently expressed a strong preference toward post-grant review petitions. *See, e.g., Multi-Color Corp. v. Brook & Whittle Ltd.*, PGR2025-00025, Paper 10 (July 16, 2025) (precedential) ("Petitions for post-grant review are favored because they ... occur before expectations in the patent rights are strongly settled."). Patent Owner clearly delayed its complaint to avoid the Board's preference for post-grant review, and such litigation tactics should be disfavored, nor should Patent Owner be rewarded for its gamesmanship through a discretionary denial.

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IV. THE EXAMINER ERRED IN ALLOWING THE '703 PATENT

The prosecution of the '703 patent did not involve any denials based on Sections 102 or 103. Instead, the Office rejected the pending claims on the ground of nonstatutory double patenting in view of the related '139 patent. EX1004, June 21, 2024 Office Action. The applicant overcame that rejection by filing a terminal disclaimer. Accordingly, the prosecution history of the '139 patent is relevant and material.

The examiner erred in allowing the '703 patent because the '703 patent is *broad*er than the '139 patent and, during the prosecution of the '193 patent, the examiner had found every limitation that overlaps with claim 1 of the '703 patent to be disclosed in the prior art. The independent claim of the '193 patent for which the examiner rejected was as follows:

16. (New) A method comprising:
 - receiving, by a digital receiver, a selection of a new piece of content for playback during playback of a first piece of content;
 - in response to the receiving of the selection, transitioning from playback of the first piece of content to the new piece of content;
 - determining whether the new piece of content is of a same content type as the first piece of content; and
 - based on the new piece of content being the same content type as the first piece of content, determining whether to preserve at least a portion of a playback pipeline used to play back the first piece of content, the preserving of at least the portion of the playback pipeline comprising preserving one or more of a source element, a demultiplexer, an audio decoder, or a video decoder.

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EX1003, 428. In addition, then-dependent claims 21 and 23 (which were also rejected) recited the following:

21. (New) The method of claim 16, wherein:
- the transitioning from playback of the first piece of content to the new piece of content comprises initiating playback of the new piece of content using a bitrate used for the playback of the first piece of content; and
 - the determining whether to preserve occurs during playback of the new piece of content using the bitrate.
23. (New) The method of claim 16, further comprising:
- based on the first piece of content and the new piece of content not being the same content type, deconstructing the playback pipeline by releasing the source element, the demultiplexer, the audio decoder, and the video decoder; and
 - creating a new playback pipeline by acquiring other resources that are applicable to a content type of the new piece of content.

EX1003, 429. Yet, together, these claims include each of the limitations of claim 1 of the '703 patent, which is recited below with one notable limitation underlined:

1. A method performed by a digital receiver, the method comprising:
- receiving a selection of a new piece of content for playback during playback of a first piece of content;
 - in response to the receiving of the selection, transitioning to the new piece of content;
 - determining whether the new piece of content is of a same content type as the first piece of content; and
 - based on the new piece of content being the same content type as the first piece of content, determining whether to preserve at least a portion of a playback pipeline used to play back the first piece of content, the playback

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pipeline comprising a source element to manage the downloading of content data for the new piece of content, a demultiplexer, an audio decoder, and a video decoder, the preserving of at least the portion of the playback pipeline comprising preserving one or more of the source element, the demultiplexer, the audio decoder, or the video decoder used to obtain the first piece of content for the new piece of content.

The underlined portion represents the one difference between the rejected *independent* claim of the '139 patent and the allowed independent claim of the '703 patent. This limitation recites that the playback pipeline has a source element that manages downloading of content, demultiplexer, audio decoder, and video decoder. Yet these can be found in the rejected dependent claims of the '139 patent. Tejected claim 21 of the '139 patent describes managing bitrate (which meets “manag[ing] the download of content data,” *see* claim 10 of the '703 patent), and rejected claim 23 of the '139 patent requires a playback pipeline containing a source element, demultiplexer, audio decoder, and video decoder. In other words, every limitation of claim 1 of the '703 patent can be found in the rejected claims of the '139 patent.

The examiner rejected the then-pending claims of the '139 patent, including then-pending claims 16, 21, and 23, as either anticipated by Shintani, or rendered obvious in view of Shintani and U.S. Pat. Pub. No. 2011/01296047 to Orr (“Orr-

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047”).³ EX1003, 351-58. To overcome these references, the applicant made the following amendment to the independent claim:

16. (Currently Amended) A method comprising:
- causing playback of a first piece of content using a playback pipeline;
 - receiving, by a digital receiver, a selection of a new piece of content for playback during playback of ~~[[a]]~~the first piece of content;
 - in response to the receiving of the selection, transitioning from playback of the first piece of content to the new piece of content;
 - determining whether the new piece of content is of a same content type as the first piece of content; ~~[[and]]~~
 - based on the new piece of content being the same content type as the first piece of content, determining whether an audio decoder or a video decoder to preserve at least a portion of ~~[[a]]~~the playback pipeline used to play back the first piece of content should be preserved; and
 - based on a determination that the audio decoder and the video decoder should not be preserved, [[the]]preserving of at least the portion of the playback pipeline comprising preserving ~~one or more of~~ a source element~~[[,]]~~ and a demultiplexer[[, an]] of the playback pipeline while replacing the audio decoder~~[[, or a]]~~ and the video decoder.

EX1003, 92.

This new limitation determines whether the audio and video decoders should not be preserved, and then replacing only those components of the playback pipeline while preserving the source element and demultiplexer. The allowed claims of the '193 patent are therefore narrower because they identify a specific determination

³ Orr-047 is not related to the Orr reference used in the Petition.

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that the decoders should not preserved and identify the specific components which should be replaced. This is not recited in the '703 patent.

The examiner of the '703 patent materially erred in allowing the claims of the '703 patent. In view of the fact that nearly identical limitations had been found disclosed in the prior art during the prosecution of the '193 patent, the examiner materially erred by not rejecting the claims of the '703 patent. Through the examiner's error, Patent Owner was able to recapture claims that the examiner had previously rejected.

V. THE *FINTIV* FACTORS WEIGH AGAINST DISCRETIONARY DENIAL

The *Fintiv* factors heavily weigh against denial, including the fact that trial is scheduled for April 2028, six months *after* the latest due date for the Final Written Decision. Tellingly, Patent Owner largely does not address any of the *Fintiv* factors with respect to the parallel litigation, precisely because they are heavily weighed against denial. Patent Owner instead attempts to use the *Fintiv* factors with earlier proceedings brought by Patent Owner involving unrelated patents—which is addressed in Section VI, *infra*. Nevertheless, Patent Owner should be foreclosed from relying on the first district court case—instead of suing on all five patents, it intentionally brought the '703 patent infringement allegations in a later, separate

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proceeding to avoid PGR. It should not be permitted to benefit from that plain gamesmanship. The facts of *this* case plainly weigh heavily in favor of institution.

A. Factor 1: The District Court is Inclined to a Stay

This factor weighs against denial because the Court is likely to stay the case if this proceeding is instituted. The parallel litigation only involves this patent. The presiding judge, Judge Choe-Groves, is a judge from the United States Court of International Trade sitting by designation—but has presided over dozens of patent cases in the District of Delaware. Her typical practice is to stay cases where all of the patents have been instituted in an AIA trial or *ex parte* reexamination. *See, e.g., AutoConnect Holdings LLC v. Ford Motor Co.*, Case No. 1:24-cv-01327-JCG, Dkt. 72 (D. Del. Apr. 16, 2026) (granting stay when ten of thirteen patents subject to IPR or *ex parte* reexamination). This factor weighs against discretionary denial.

B. Factor 2: Trial Is Scheduled For April 2028

Trial is scheduled for April 3, 2028, nearly six months after the statutory deadline for the Final Written Decision—October 8, 2027. Thus, the Board is expected to resolve patentability first—precisely the circumstance where discretionary denial is disfavored. *See, e.g., FreightCar America, Inc. v. National Steel Car Ltd.*, IPR2025-01046, Paper 20 (Oct. 10, 2025) (declining to deny institution because final written decision due date was 1 month before trial date). This factor weighs against discretionary denial.

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C. Factor 3: The Parties' Limited Investment In The District Court Litigation Weighs Against Discretionary Denial

This factor significantly weighs against discretionary denial. As of the filing of this Opposition, the parallel litigation is in its early stages. Patent Owner only recently served its infringement contentions and Petitioner served its invalidity contentions a week ago. Very little discovery has taken place—the parties served their initial discovery requests, but neither has responded. As for claim construction, the parties are not scheduled to exchange terms until July 17, and briefing won't be completed until near the end of the year—November 19. The Court has scheduled a claim construction hearing for January 19, 2027, over three months after the Board's statutory deadline for institution.

Moreover, Petitioner exercised diligence in bringing the IPR petitions without delay. This petition was filed a little more than four months after Patent Owner served its complaint. This factor weighs against discretionary denial.

D. Factor 4: Petitioner's Broad Stipulation

Petitioner has filed a broad *Sotera* stipulation (Paper 6) agreeing not to raise any challenges it could have brought in this proceeding, which weighs against denial. Patent Owner argues that Petitioner's stipulation does not cover “duplicative system art.” Request, 11-12. But because this proceeding is so far in advance of trial, this eliminates any risk of duplication or inconsistent rulings, as the Section 315(e)

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estoppel will apply to the litigation well before trial. Patent Owner cannot complain that the Section 315(e) estoppel is too narrow because it intentionally waited to bring this lawsuit to avoid the PGR window—had it gave Petitioner an opportunity to bring a PGR petition, the broader PGR estoppel would instead apply. Moreover, Petitioner’s stipulation will save significant litigation resources from the parties. Most of the prior art that Petitioner relies on in its invalidity contentions in the parallel litigation are printed publications. If this proceeding is instituted, the parties will not have to engage in discovery, serve expert opinions, or otherwise litigate on anticipation or obviousness based on those references. This factor weighs against discretionary denial.

E. Factor 5: Petitioners Being the District Court Defendants Does Not Outweigh the Factors Weighing Against Discretionary Denial

Petitioner is the defendant in the district court case. This factor does not outweigh the other factors discussed above.

F. Factor 6: The Merits of the Petition are Strong

Even though the merits of the petition are a discretionary factor, Patent Owner has not raised any merits-related arguments in its Request. The merits of the Petition are strong, and as explained below, the Office’s minimal examination of the ’703 patent was not justified in view of the prior art. This factor therefore weighs against discretionary denial.

VI. THE OTHER PROCEEDINGS BETWEEN THE PARTIES DO NOT WARRANT DENIAL

Rather than focus on discretionary factors related to the '703 patent, Patent Owner's Request instead focuses on other proceedings involving different patents that *Patent Owner* brought, none of which involve the '703 patent. These proceedings have little to no relevance to the proceeding here—and Patent Owner's arguments should be rejected. Again, it was Patent Owner's deliberate decision to bring a separate lawsuit asserting the '703 patent, all in order to avoid the PGR window. Patent Owner cannot claim the benefit of the earlier proceedings when it deliberately delayed this proceeding as a litigation tactic.

A. The Other Proceedings Between The Parties Do Not Warrant Denial Under *Fintiv*

As shown above, the *Fintiv* factors all weigh against denial. Patent Owner attempts to muddy the waters by discussing the *Fintiv* factors in view of the combined schedules of *all* of the proceedings that Patent Owner has brought against Petitioner. This includes an earlier Delaware litigation where Patent Owner has asserted four unrelated patents accusing completely different technology ("First District Court Action"). This also includes two proceedings in Europe—one against a European counterpart to the '703 patent ("UPC Action") and another against an unrelated patent ("German Action"). Patent Owner's decision to litigate against

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Petitioner in numerous venues involving a broad swath of patents should not be held against Petitioner.

Patent Owner argues that instituting the IPR would not be an efficient use of resources because “several major events” in other proceedings not involving the ’703 patent will have occurred by the time the Board issues its Final Written Decision. Request, 8-9. But none of these other proceedings involve the ’703 patent, and the First District Court Action and German Action involve unrelated patents and technology. While the UPC Action involves the European counterpart to the ’703 patent, what happens in the UPC Action has no bearing in the United States. The Unified Patent Court has different rules, different procedures, different evidentiary standards, and different standards of proof. Its rulings have no jurisdiction over the United States. Patent Owner does not cite to any authority that the timing of a foreign court’s adjudication of a foreign patent should have any bearing on the Board’s decision to institute an IPR.

Patent Owner claims it has “invested significantly in the First and Second District Court Actions.” Request, 9-10. As explained above, the parties have invested very little into the “Second District Court Action,” the only litigation involving the ’703 patent. The “First District Court Action,” on the other hand, involves four unrelated patents directed to completely different technology. Whereas the ’703 patent is directed to preserving a video playback pipeline, the

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patents in the First District Court Action involve generating a customized playlist, serving customized ads, and initiating video playback based on available resources. Thus, the First District Court Action involves very different accused technologies. There is simply no justification to apply *Fintiv* to litigation involving unrelated patents.

Finally, Patent Owner argues the Board is not an “efficient alternative forum for resolving the parties’ pending litigation” because Petitioner has filed IPR petitions against two patents related to the ’703 patent that have not been asserted—the ’139 and ’652 patents. Patent Owner’s argument is illogical. By accusing Petitioner of infringing multiple unrelated patents in multiple countries, Patent Owner has assured that the Board ***cannot*** be an alternative forum for resolving ***all*** of the parties’ pending litigation. Obviously, the Board can only resolve certain validity issues with respect to the ’703 patent—it was solely Patent Owner’s choice to create disputes with Petitioner that go well-beyond the ’703 patent. Petitioner’s additional IPR challenges do not change this fundamental fact arising out of Patent Owner’s deliberate litigation tactics.

Petitioner’s IPR challenges against the ’139 and ’652 patents, in fact, prove that instituting here is an efficient use of resources. Like the ’703 patent, the ’139 and ’652 patents are directed to preserving a playback pipeline when new content is selected. All three patents also recite reusing bitrates for new content. Because of

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the significant overlap between the '703 patent and the two related patents, many substantive issues decided in this proceeding will apply to the other two proceedings. This allows the Board to efficiently adjudicate the patentability of all three patents, improving the patent system—by either invalidating obvious patents or upholding novel ones—for a fraction of the cost otherwise.

B. Petitioner Has Not Taken Inconsistent Claim Construction Positions

Petitioner has proposed that the terms of the '703 patent be given their plain and ordinary meaning. Patent Owner argues that *Revvo* should speculatively apply because “it strains credulity” to believe Petitioner will maintain consistent claim construction positions. Request, 15.

Although claim construction has yet to begin in the parallel litigation, Petitioner will not take different positions there—to the extent Petitioner even proposes express constructions (which Petitioner has not yet decided), they will be consistent with their plain and ordinary meaning in view of the intrinsic evidence and entirely consistent with how Petitioner has applied the prior art in the '703 patent. Petitioner is well-aware of the problems that are introduced in IPR proceedings from proposing inconsistent claim constructions, as the Director explained in *Revvo*, and Petitioner's claim construction positions in the parallel litigation will not trigger those concerns. Given the efficiency of IPR proceedings,

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Petitioner has no intention of sabotaging this IPR proceeding to pursue a litigation advantage. Accordingly, Patent Owner's argument that *Revvo* requires denial is baseless.

Patent Owner instead points to the positions Petitioner's German subsidiary has taken in the foreign UPC action. Request, 13-14. *First*, Patent Owner does not in any way explain how the UPC claim constructions are inconsistent with the positions taken here. *Second*, claim construction positions in a foreign venue involving a different patent using completely different standards of construction and evidence do not trigger any of the Director's concerns mentioned in *Revvo*. *Revvo* explains that its claim construction rules "ensure that the Board correctly construes claim terms and to minimize inconsistency in claim construction between forums." *Revvo*, at 4. There is no danger of inconsistency because the UPC is not construing the '703 patent and does not use the same standards of construction or evidence—neither the District Court or the Board is under any obligation to even consider what a foreign court does. Thus, it is not surprising that Patent Owner does not argue that *Revvo* should apply to the UPC claim constructions. Instead, Patent Owner uses the UPC claim constructions to speculate about what Petitioner will do in the parallel district court action. But as discussed above, such speculation is baseless and wrong.

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DATED: July 8, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 8, 2026, true and correct copies of the foregoing document and supporting materials were served in its entirety at the following email addresses:

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DATED: July 8, 2026

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