

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,

Petitioner,

v.

TIR TECHNOLOGIES LIMITED,

Patent Owner.

Case IPR2026-00346
U.S. Patent No. 9,800,633

**TIR TECHNOLOGIES LIMITED'S
REQUEST FOR DISCRETIONARY
DENIAL OF INSTITUTION**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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2001	Order Granting Defendant's Motion to Dismiss, Dkt. 61, <i>Tir Technologies Limited v. Meta Platforms, Inc.</i> , No. 8:25-cv-02345-SVW-ADS (C.D. Cal. June 25, 2026)
2002	Scheduling Order, Dkt. 40, <i>Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.</i> , No. 1:25-cv-00865-RP, Scheduling Order (W.D. Tex. Sept. 22, 2025)
2003	Defendants' Supplemental Preliminary Invalidity Contentions and Identification of Claims Defendants Contend are Directed to Ineligible Subject Matter, <i>Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.</i> , No. 1:25-cv-00865-RP (W.D. Tex. Feb. 16, 2026)
2004	Defendant Meta Platforms, Inc. Motion to Dismiss First Amended Complaint and Memorandum of Points and Authorities, Dkt. 34, <i>Tir Technologies Limited v. Meta Platforms, Inc.</i> , No. 8:25-cv-02345-SVW-ADS (C.D. Cal. Jan. 28, 2026)
2005	Tir Technologies Limited's Memorandum in Opposition to Motion to Dismiss, Dkt. 37, <i>Tir Technologies Limited v. Meta Platforms, Inc.</i> , No. 8:25-cv-02345-SVW-ADS (C.D. Cal. Feb. 17, 2026)

LISTING OF CHALLENGED CLAIMS

Reference	Limitation
Claim 1	
1[pre]	A method for streaming optimized video to a client device, the method comprising:
1[a]	receiving a request to optimize an original source file from a client device, the original source file stored on an origin server and the request including a key specifying parameters for optimizing the original source file and uniquely identifying the original source file;
1[b]	identifying, based on the key, a preview of an optimized version of the original source file in a local cache of a video optimization server, the preview corresponding to a first portion of the optimized version of the original source file;
1[c]	generating a query, based on the key, to a cache database maintaining a plurality of reference keys corresponding to a plurality of optimized versions of source files stored on a plurality of other video optimization servers, each reference key specifying parameters of an optimized version of a source file and uniquely identifying the source file;
1[d]	receiving, from the cache database, a response indicating whether the key matches a reference key maintained in the database;
1[e]	receiving from the cache database, in response to a reference key matching the key, the address of another video optimizer storing a segment of the optimized version of the original source file;
1[f]	stitching the first portion of the optimized version of the original source file with the segment of the optimized version of the original source file stored on the other video optimizer to generate a stitched optimized version of the original source file; and

Reference	Limitation
1[g]	streaming the stitched optimized version of the original source file for playback on the client device.
Claim 2	
2[a]	The method of claim 1, further comprising: storing a segment of the stitched optimized version of the original source file in the cache of the video optimizer; and
2[b]	transmitting, to the cache database, instructions for updating the cache database in response to storing the segment of the stitched optimized version of the original source file stored in the video optimizer
Claim 3	
3	The method of claim 1, wherein the received response indicates that different segments of the optimized version of the same original source file are stored on a plurality of different video optimizers.
Claim 4	
4[a]	The method of claim 3, further comprising: transmitting, to the plurality of different video optimizers, a request for the segment of the optimized version of the original source file stored on each video optimizer; and
4[b]	stitching the different segments of the optimized version of the same original source file with the generated segment of the original source file.
Claim 5	
5	The method of claim 1, wherein the key comprises a source content signature, the source content signature being a hash of the original source file.

Reference	Limitation
Claim 6	
6	The method of claim 1, wherein the cache database comprising data entries identifying a plurality of optimization server storing an optimized version of the original source file, the entries being modified through instructions transmitted to the cache database to update a location where the optimized version of the original source file is stored.
Claim 7	
7[pre]	The method of claim 1, further comprising:
7[a]	determining a second segment of the optimized version of the original source file is not stored by the plurality of other video optimization servers;
7[b]	responsive to the determination, transcoding the second segment of the original source file;
7[c]	storing the transcoded second segment in the local cache of the video optimization server; and
7[d]	stitching the transcoded second segment with the stitched optimized version of the original source file.
Claim 8	
8	The method of claim 7, further comprising transmitting to the cache database, instructions for updating the cache database with a reference key corresponding to the transcoded second segment of the optimized version of the source file stored at the video optimization server.

Reference	Limitation
Claim 9	
9[a]	The method of claim 7, wherein transcoding the second segment of the original source file comprises: identifying a third segment of the optimized version of the original source file, subsequent to the second segment, that is stored by one of the plurality of other video optimization servers; and
9[b]	transcoding the original source file from a start of the second segment to a start of the third segment.
Claim 10	
10	The method of claim 1, wherein the preview is maintained in the local cache of the video optimization server after one or more purges of the local cache.
Claim 11	
11[pre]	A system for streaming optimized video to a client device, comprising:
11[a]	at least one processor; and
11[b]	a non-transitory computer-readable storage medium storing executable computer program instructions that when executed by the processor, cause the processor to:
11[c]	receive a request to optimize an original source file from a client device, the original source file stored on an origin server and the request including a key specifying parameters for optimizing the original source file and uniquely identifying the original source file;
11[d]	identify, based on the key, a preview of an optimized version of the original source file in a local cache of a video optimization server, the preview corresponding to a first portion of the optimized version of the original source file;

Reference	Limitation
11[e]	generate a query, based on the key, to a cache database maintaining a plurality of reference keys corresponding to a plurality of optimized versions of source files stored on a plurality of other video optimization servers, each reference key specifying parameters of an optimized version of a source file and uniquely identifying the source file;
11[f]	receive, from the cache database, a response indicating whether the key matches a reference key maintained in the database;
11[g]	receive from the cache database, in response to a reference key matching the key, the address of another video optimizer storing a segment of the optimized version of the original source file;
11[h]	stitch the first portion of the optimized version of the original source file with the segment of the optimized version of the original source file stored on the other video optimizer to generate a stitched optimized version of the original source file; and
11[i]	stream the stitched optimized version of the original source file for playback on the client device.
Claim 12	
12[a]	The system of claim 11, wherein the storage medium further comprises instructions that when executed cause the processor to: store a segment of the stitched optimized version of the original source file in the cache of the video optimizer; and
12[b]	transmit, to the cache database, instructions for updating the cache database in response to storing the segment of the stitched optimized version of the original source file stored in the video optimizer.

Reference	Limitation
Claim 13	
13[pre]	The system of claim 11, wherein the received response indicates that different segments of the optimized version of the same original source file are stored on a plurality of different video optimizers, and wherein the storage medium further comprises instructions that when executed cause the processor to:
13[a]	transmit, to the plurality of different video optimizers, a request for the segment of the optimized version of the original source file stored on each video optimizer; and
13[b]	stitch the different segments of the optimized version of the same original source file with the generated segment of the original source file.
Claim 14	
14	The system of claim 11, wherein the key comprises a source content signature, the source content signature being a hash of the original source file.
Claim 15	
15	The system of claim 11, wherein the cache database comprises data entries to identify a plurality of optimization servers storing an optimized version of the original source file, the entries being modified through instructions transmitted to the cache database to update a location where the optimized version of the original source file is stored.
Claim 16	
16[pre]	The system of claim 11, wherein the storage medium further comprises instructions that when executed cause the processor to:
16[a]	determine a second segment of the optimized version of the original source file is not stored by the plurality of other video optimization servers;

Reference	Limitation
16[b]	transcode, responsive to the determination, the second segment of the original source file;
16[c]	store the transcoded second segment in the local cache of the video optimization server; and
16[d]	stitch the transcoded second segment with the stitched optimized version of the original source file.
Claim 17	
17	The system of claim 16, wherein the storage medium further comprises instructions that when executed cause the processor to transmit to the cache database, instructions for updating the cache database with a reference key corresponding to the transcoded
	second segment of the optimized version of the source file stored at the video optimization server.
Claim 18	
18[a]	The system of claim 16, wherein the instructions on the computer readable storage medium to transcode the second medium further comprises instructions that when executed cause the processor to: identify a third segment of the optimized version of the original source file, subsequent to the second segment, that is stored by one of the plurality of other video optimization servers; and
18[b]	transcode the original source file from a start of the second segment to a start of the third segment.
Claim 19	
19	The system of claim 11, wherein the preview is maintained in the local cache of the video optimization server after one or more purges of the local cache.

I. INTRODUCTION

The Director should exercise discretion to deny institution because institution would be an inefficient use of Patent Office resources where, as here, Petitioner has taken inconsistent claim construction positions in the District Court and in this proceeding, the district court litigation between the parties was dismissed, Petitioner is relying on prior art references that were in the prosecution history, and there are settled expectations.

In this *inter partes* review proceeding, Meta did not propose its own constructions for claim terms, stating that “[n]o express constructions are necessary;” Paper 1, Pet., at 6. However, in the District Court, Meta asserted that the claims require that a single request’s single key is used to identify at least two distinct pieces of optimized video stored in at least two distinct locations, and Meta predicated the motion to dismiss on the Court construing the claim limitations of “a request ... including a key” to mean a single request ... including a single key. The District Court applied Meta’s construction when the Court granted Meta’s motion and dismissed the case. *See* Exhibit 2001 (*Tir Technologies Limited v. Meta Platforms, Inc.*, No. 8:25-cv-02345-SVW-ADS, Order Granting Defendant’s Motion to Dismiss (C.D. Cal. June 25, 2026)) (“Dismissal”), at 5.

There was only one ongoing district court litigation matter between Patent Owner, Tir Technologies, (“Tir”), and Petitioner, Meta Platforms, Inc., (“Meta”) on

U.S. Patent No. 9,800,633 (“the ’633 Patent”) and that is no longer ongoing because Patent Owner’s infringement claims against Meta on the ’633 Patent were dismissed. *See* Exhibit 2001 (*Tir Technologies Limited v. Meta Platforms, Inc.*, No. 8:25-cv-02345-SVW-ADS, Order Granting Defendant’s Motion to Dismiss (C.D. Cal. June 25, 2026)) (“Dismissal”), at 1, 6.

Moreover, this is not the only pending district court litigation involving the ’633 Patent. *Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.*, No. 1:25-cv-00865-RP, is proceeding in the District Court for the Western District of Texas with a scheduled trial date of October 18, 2027 – before the Final Decision is due in this proceeding on November 19, 2027. *See* Exhibit 2002, (*Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.*, No. 1:25-cv-00865-RP, Scheduling Order (W.D. Texas Sept. 22, 2025)) (“Scheduling Order”) at 7. Under the current interim discretionary-denial framework, these are highly relevant because the Board and Director may consider any fact bearing on efficiency, integrity of the patent system, and the appropriate use of Office resources. *See* Memorandum, Interim Processes for PTAB Workload Management at 2-3 (Mar. 26, 2025); USPTO, Interim Director Discretionary Process,

<https://www.uspto.gov/patents/ptab/interim-director-discretionary-process> (updated Oct. 3, 2025).

The '633 patent issued on October 24, 2017, and therefore had been in force for just over eight years when Meta filed this petition. *See* Exhibit 1001, '633 Patent, at 1. And the Petition relies on prior art references that were in the prosecution history – Mills and Sackstein. The Sackstein reference and two other prior art references relied on in the Petition – Hosur and Menon – are also being applied in the Amazon litigation in the Western District of Texas. *See* Exhibit 2003, (*Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.*, No. 1:25-cv-00865-RP, Defendants' Supplemental Preliminary Invalidity Contentions and Identification of Claims Defendants Contend are Directed to Ineligible Subject Matter (W.D. Texas Feb. 16, 2026) (extracted)) ("Invalidity Contentions") at 9, 18-19.

These circumstances present exactly the type of case in which discretionary denial is warranted: the parties' district-court dispute over the '633 patent has been dismissed; settled expectations now weigh in Patent Owner's favor; and the Petition substantially reuses prior art references that were already considered in the prosecution and/or are being applied against the '633 Patent in the ongoing Amazon

litigation. The Petition should be denied under 35 U.S.C. § 314(a), and the overlapping prior art also supports denial under 35 U.S.C. § 325(d).

II. DISCRETIONARY DENIAL IS APPROPRIATE

A. Petitioner presented inconsistent claim construction positions in the parallel district court litigation involving the same parties and in this *inter partes* review.

As the Director explained in a precedential decision, permitting different claim construction positions before a district court and the Board without sufficient explanation detracts from the Office’s goal of providing greater predictability and certainty in the patent system. *See, e.g., Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc.*, IPR2025-00632, Paper 20 (PTAB Nov. 3, 2025) (precedential). As the Director noted, “the rules discourage petitioners from seeking broader constructions at the Board to support a patentability challenge while seeking narrower constructions in litigation to avoid infringement liability.” *Id.*, Paper 20 at 4 (citation omitted).

In this *inter partes* review proceeding, Meta did not propose its own constructions for claim terms, stating that “[n]o express constructions are necessary;” Paper 1, Pet., at 7. However, in the District Court litigation, Meta asserted that “the claims require that a single request’s single key is used to identify at least two distinct pieces of optimized video stored in at least two distinct locations: the first preview/portion on a first video optimization server/video optimizer (blue), and the

second segment on a second video optimizer (green).” Exhibit 2004, (Defendant Meta Platforms, Inc. Motion to Dismiss First Amended Complaint and Memorandum of Points and Authorities, Dkt. 34, *Tir Technologies Limited v. Meta Platforms, Inc.*, No. 8:25-cv-02345-SVW-ADS, (C.D. Cal. Jan. 28, 2026)), at 8. As Tir pointed out in opposition, “Meta’s argument is predicated on the Court construing ‘a request ... including a key’ to mean ‘a single request ... including a single key.’” Exhibit 2005, (Tir Technologies Limited’s Memorandum in Opposition to Motion to Dismiss, Dkt. 37, *Tir Technologies Limited v. Meta Platforms, Inc.*, No. 8:25-cv-02345-SVW-ADS, (C.D. Cal. Feb. 17, 2026)) at 4.

Although Meta argued that it was not proposing claim construction but merely reading the words of the claim, any “claim construction inquiry ... begins and ends with the actual words of the claims.” *Renishaw PLC v. Marposs Societa’ Per Azioni*, 158 F.3d 1243, 1248 (Fed. Cir. 1998). “Claim construction is the judicial statement of what is and is not covered by the technical terms and other words of the claims.” *Netword, LLC v. Centraal Corp.*, 242 F.3d 1347, 1352 (Fed. Cir. 2001) (cleaned up). As the Federal Circuit recently noted, “[i]f the outcome of the analysis of the claim term establishes the scope (e.g., boundaries) and meaning of the patented subject matter, the court (or the Board) has mostly likely construed the claim.” *Google LLC v. Ecofactor Inc.*, 92 F.4th 1049, 1055 (Fed. Cir. 2024) (citing *Netword*, 242 F.3d at 1352; *Trading Techs. Int’l, Inc. v. Open E Cry, LLC*, 728 F.3d 1309, 1319 (Fed. Cir.

2013)). Statements by the tribunal (or the parties) as to whether or not they are engaging in claim construction are not dispositive, and the Federal Circuit has found implicit claim constructions even when the tribunal does not recognize that it is construing a claim when the scope of the patented subject matter was established. *Id.*, 92 F.4th at 1056 (citing *HTC Corp. v. Cellular Comms. Equip., LLC*, 877 F.3d 1361, 1367 (Fed. Cir. 2017)).

Meta's arguments in the district court seeking to establish the scope (e.g., boundaries) and meaning of the asserted claims are claim construction arguments initially propounded by Meta before the instant Petition was filed on May 13, 2026, and Meta did not even attempt to explain why it advanced a narrow construction in district court and a broader construction in the Petition. For this reason alone, institution should be denied. *See Sun Pharmaceuticals Industries, Inc. v. Nivagen Pharmaceuticals, Inc.*, IPR2025-00893, Paper 18 at 2-3 (PTAB Sept. 19, 2025) (informative) (denying institution of *inter partes* review).

B. The parallel district court litigation involving Tir and Meta has ended and institution would be an inefficient use of Board resources.

When the instant Petition was filed, *Tir Technologies Limited v. Meta Platforms, Inc.*, No. 8:25-cv-02345-SVW-ADS, was ongoing in the United States District Court for the Central District of California. That was, and is, the only district court litigation between Tir and Meta relating to the '633 Patent. That district court

litigation ended on June 25, 2026, when the District Court granted Meta's motion to dismiss. *See* Exhibit 2001, Dismissal, at 1-6.

This procedural posture strongly favors denial. In *Ericsson Inc. v. Procomm International Pte. Ltd.*, the Director denied institution where the challenged patent had been dismissed from the parallel litigation, explaining that Patent Owner's inefficiency and settled-expectations arguments tipped the balance toward discretionary denial. *Ericsson Inc. v. Procomm Int'l Pte. Ltd.*, IPR2024-01453, Paper 15 at 2-3 (Director, June 25, 2025). The Director emphasized both that the patent had been dismissed and that reviewing it would be an inefficient use of Board resources. *Id.* The same logic applies here. Patent Owner's infringement claim against Meta on the '633 patent is dismissed along with the remainder of the case. Meta's remaining interest is, at most, a free-standing invalidity challenge untethered to a live infringement claim by Patent Owner against Meta.

Institution now would spend Office resources on a dispute that Petitioner itself no longer faces as an infringement claim. The current process expressly permits denial based on the holistic question whether institution would serve efficiency and integrity. *See* Memorandum, Interim Processes for PTAB Workload Management at 2-3 (Mar. 26, 2025); USPTO, Interim Director Discretionary Process, <https://www.uspto.gov/patents/ptab/interim-director-discretionary-process> (updated Oct. 3, 2025).

C. The prior art references relied on in the Petition overlap with the prosecution history and invalidity challenges pending in other district court litigation involving the '633 Patent.

The Prior Art relied upon in this Petition is neither new nor uniquely raised in this *inter partes* review. Duplicative consideration of prior art is contrary to the efficiency, integrity of the patent system, and the appropriate use of Office resources. Petitioner's cited prior art includes two prior art references from the prosecution history of the '633 Patent. The first recycled prior art reference is Exhibit 1007, U.S. 2009/0119322 ("Mills"). *See* Paper 1, Pet., at 2. Mills is identified as a cited reference in the '633 Patent. *See* Ex. 1001, **References Cited** U.S. PATENT DOCUMENTS. The second recycled prior art reference is Exhibit 1008, U.S. 20098/0310668 ("Sackstein"). *See* Paper 1, Pet., at 2. Sackstein is also identified as a cited reference in the '633 Patent. *See* Ex. 1001, **References Cited** U.S. PATENT DOCUMENTS.

That overlap is relevant both to the holistic § 314(a) analysis and to whether the petition presents substantially the same art previously presented to the Office. Under *Advanced Bionics* and *Becton, Dickinson*, that history matters. When the Office has already seen materially similar art or argument pathways, a later petition must do more than restyle the same basic challenge and label the prior outcome examiner error. *See Advanced Bionics, LLC v. Med-El Elektromedizinische Geräte GmbH*, IPR2019-01469, Paper 6 at 8-10 (PTAB Feb. 13, 2020) (precedential);

Becton, Dickinson & Co. v. B. Braun Melsungen AG, IPR2017-01586, Paper 8 at 17-18 (PTAB Dec. 15, 2017) (precedential).

Not only was the Petitioner's prior art already considered by the Patent Office during the prosecution of the '633 Patent, but it is also being applied in an ongoing district court litigation that will be decided before the due date for a Final Written Decision here. The Petition grounds are also based on Exhibit 1006, U.S. 2010/0070608 ("Hosur") and Exhibit 1009, U.S. 7,860,950 ("Menon"). See Paper 1, Pet., at 2-3. The Hosur, Menon and Sackstein prior art references are all being applied in the Amazon litigation in the Western District of Texas. See Exhibit 2003, (*Tir Technologies Limited v. Amazon.com Services LLC, Amazon Web Services, Inc., Amazon Development Center U.S., Inc., AWS Security Assurances Services LLC, and Amazon Data Services, Inc.*, No. 1:25-cv-00865-RP, Defendants' Supplemental Preliminary Invalidity Contentions and Identification of Claims Defendants Contend are Directed to Ineligible Subject Matter (W.D. Texas Feb. 16, 2026) (extracted)) ("Invalidity Contentions") at 9, 18-19. Although the number of the Menon patent in the Amazon litigation is not identical to that in the Petition, the disclosure of the Menon patent (U.S. Pat. No. 7,860,950) in the Petition is identical because the Menon patent in the Amazon litigation (U.S. Pat. No. 7,359,955) issued from a divisional application. See Exhibit 1009, **Related U.S. Application Data** (62). Duplicative application of three prior art references to the same patent in different

forums is not an appropriate use of patent system resources because of its inherent inefficiency and the possibility of inconsistent results.

D. Settled expectations favor denial.

The '630 Patent issued on October 24, 2017. Exhibit 1001, '630 Patent, at 1. The Petition was not filed until May 13, 2026. Paper 3, Notice of Filing Date Accorded to Petition, at 1. By then, the '630 Patent had been in force for more than eight years.

Recent Director decisions treat that timing as significant. In *Dabico Airport Solutions Inc. v. AXA Power ApS*, the Acting Director granted discretionary denial where the challenged patent had been in force less than eight years, explaining that this created settled expectations. *Dabico Airport Solutions Inc. v. AXA Power ApS*, IPR2025-00408, Paper 21 at 2-3 (PTAB June 18, 2025). The Acting Director further explained that actual notice of a patent or of possible infringement is not necessary to create settled expectations because patents and published applications are publicly available and interested parties may search for them. *Id.* at 3. Similarly, in *iRhythm Technologies, Inc. v. Welch Allyn, Inc.*, the Acting Director also granted discretionary denial based on settled expectations, holding that the petitioner's awareness of the patent owner's applications and failure to seek early review favored denial and outweighed countervailing considerations, including a likely final written decision before trial, little district-court investment, and a high likelihood of a stay.

iRhythm Technologies, Inc. v. Welch Allyn, Inc., IPR2025-00363, Paper 10 at 2-3 (PTAB June 6, 2025).

As the Acting Director noted in *Kahoot! As v. Interstellar Inc.*, the argument “that Patent Owner does not have settled expectations because Patent Owner did not previously assert the challenged patent against Petitioner does not defeat Patent Owner’s settled expectations.” *Kahoot! As v. Interstellar Inc.*, IPR2025-00696, Paper 12 at 2 (PTAB July 31, 2025).

III. CONCLUSION

For all of these reasons, the Director should exercise discretion to deny institution. Petitioner made inconsistent claim construction arguments in the parallel district court litigation and in these proceedings; the parallel district court dispute between the parties involving the ’633 patent has ended, making institution an inefficient use of Board resources; the Petition substantially reuses art already considered by the Office and art that will be applied in another district court trial scheduled before the Final Written Decision here, and settled expectations weigh in Patent Owner’s favor. On this record, efficiency, fairness, and integrity of the patent system are best served by discretionary denial under 35 U.S.C. § 314(a), and the overlap in art also supports denial under 35 U.S.C. § 325(d).

Date: July 20, 2026

Respectfully submitted,

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Lead counsel for Patent Owner

CERTIFICATION REGARDING WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), Patent Owner certifies that there are no more than 2,498 words in the paper, excluding the portions exempted under 37 C.F.R. § 42.24(a)(1).

Dated: July 20, 2026

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on July 20, 2026, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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