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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 TIR TECHNOLOGIES LIMITED,

11 Plaintiff,

12 v.

13 META PLATFORMS, INC.,

14 Defendant.
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Case No. 8:25-cv-2345-SVW-ADS

**DEFENDANT META
PLATFORMS, INC. REPLY IN
SUPPORT OF ITS MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

March 16, 2026, 1:30pm
Honorable Stephen V. Wilson

DEMAND FOR JURY TRIAL

META-1039

Meta Platforms, Inc. v. Tir Technologies, Ltd., IPR2026-00346, IPR2026-00347

8:25-cv-2345-SVW-ADS

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DEFENDANT'S REPLY ISO MOTION TO DISMISS AMENDED COMPLAINT

MEMORANDUM OF POINTS AND AUTHORITIES

While a patent plaintiff need not prove their case at the pleadings, it must present allegations that plausibly suggest the accused products practice every element of at least one claim. This weeds out frivolous patent assertions that provide nothing but threadbare, conclusory, or contradictory allegations untethered to fact and law.

Those are the sort of allegations Plaintiff presents here, which has already led Plaintiff to drop one patent and its contributory infringement claim from suit. But its remaining allegations cannot survive either. For several limitations of the claims still asserted, Plaintiff's allegations are relevant *only if* the claims are read in a way that is already foreclosed by settled law. Plaintiff argues that any assessment of how it is reading the claims is "claim construction" that cannot be resolved at the pleadings. But when the claim's words are clear, finding that a plaintiff presents an implausible reading is not claim construction. If it were, every overbroad assertion would automatically get past the pleadings.

For another limitation, Plaintiff provides *no factual allegation* suggesting the limitation is practiced. Instead, Plaintiff presents paragraphs of technical jargon interweaved with claim language and a few citations to Meta product elements. But the only allegation Plaintiff provides that those Meta product elements map to the claims is its conclusory assertion that they do. That is not sufficient.

Finally, Plaintiff maintains an induced infringement claim that misunderstands the legal standard and has also already been foreclosed by law.

Plaintiff has failed to plausibly assert infringement, and having already taken its mulligan, it should not get a third strike. Meta respectfully requests that the Court grant its motion with prejudice.

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I. ARGUMENT

A. Plaintiff did not plausibly plead direct infringement

1. Plaintiff’s supposed construction of limitation (a) does not change the fact that Plaintiff cannot allege infringement of limitations (b)–(e)

Plaintiff characterizes Meta’s argument as limiting claim 1 to a single key from a single request. Meta never argued that because *limitation (a)* recites “a request ... including a key”, the claim is limited to a “single request” and “key.”¹ Even if limitation (a) permits receiving multiple requests and keys, limitations (b)–(e) require that at least *one* of those keys included in *one* of those requests is used to locate *two* pieces of video. This is not claim construction, but reading the words of the claims.

Claim 1 requires “receiving a request ... including a key” (limitation (a)), where “the key” is used to identify both a first preview/portion *and* second segment of video (limitations (b)–(e)). Dkt. 34 (“Motion”) at 5–8. To allege infringement of these claims, Plaintiff must therefore plausibly allege that Meta’s system uses a single key, from a single request, to locate those two pieces of the video. *Id.* at 5–11.

Plaintiff does not allege this. Opp. at 4. Instead, Plaintiff alleges that Meta uses different requests and different keys to locate each different piece of video. *Id.* But Plaintiff argues these allegations are sufficient because *limitation (a)* recites “a request ... including *a* key,” the word “a” is typically read as “one or more,” and any argument to the contrary is claim construction not ripe for adjudication on the pleadings. Opp. at 4–5. Not so.

By reciting “the key” throughout limitations (b)–(e), each of those limitations refers to the same key. See, e.g., *Wi-Lan, Inc. v. Apple, Inc.*, 811 F.3d 455, 462 (Fed.

¹ Plaintiff misattributes a quote at Dkt. 37 (“Opp.”), 3:21–24 to Meta. META-1039
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1 Cir. 2016) (“Subsequent use of the definite articles ‘the’ or ‘said’ in a claim refers
2 back to the same term recited earlier in the claim.”); *Par Pharm., Inc. v. Baxter*
3 *Healthcare Corp.*, No. CV 23-358, 2024 WL 4100255, at *6 (D. Del. Sept. 6, 2024)
4 (finding “[t]he use of ‘the unit dosage form’ in both the ‘storing’ and ‘administering’
5 steps confirms that they utilize the same unit dosage form”). As such, “the key” that
6 identifies a first preview/portion of video is the same key that is used to query a
7 database to locate the second segment of video. And because limitations (b)–(e) refer
8 to *the same key*, Plaintiff cannot rely on different requests with different keys in
9 Meta’s system to meet these limitations.

10 The Federal Circuit has already rejected Plaintiff’s view of its claims in *In re*
11 *Varma*, 816 F.3d 1352 (Fed. Cir. 2016). There, the claims required “**a statistical**
12 **analysis request** corresponding to **two or more selected investments.**” *Id.* at 1362
13 (emphasis added). The Federal Circuit was asked whether “a statistical analysis
14 request”—which could be read as “one or more”—was met by identifying two
15 different requests that each corresponded to one statistical analysis (and thus two
16 requests corresponded to two statistical analyses in total). *Id.* The Federal Circuit
17 declined to read the claims this way, and considered such a view “unreasonable” and
18 inconsistent with the “language on [the claim’s] face.” *Id.* The Federal Circuit did
19 not resort to claim construction by analyzing intrinsic evidence or the prosecution
20 history, as Plaintiff asserts would be required. *Opp.* at 4–5. Instead, the Federal
21 Circuit needed only the words of the claim and summarized the issue as follows:

22 [T]he question is whether ‘a’ can serve to negate what is
23 required by the language following ‘a’: a ‘request’ (a
24 singular term) that ‘correspond[s]’ to ‘two or more selected
investments.’ It cannot. For a dog owner to have ‘a dog that
rolls over and fetches sticks,’ it does not suffice that he

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1 have two dogs, each able to perform just one of the tasks.
2 In the present case, ***no matter how many requests there***
3 ***may be, no matter the variety of the requests the system***
may receive, the system must be adapted to receive a
request that itself corresponds to at least two investments.

4 *Varma*, 816 F.3d at 1363 (emphasis added).

5 The Federal Circuit reaffirmed this view in *Salazar v. AT&T Mobility LLC*, 64
6 F.4th 1311 (Fed. Cir. 2023). First, the Federal Circuit noted that although claims
7 “may allow for more than a single instance of the claim element, it may nonetheless
8 require that a single instance of the element be capable of performing all the recited
9 functionality.” *Id.* at 1317. The Federal Circuit then found that “while the claim term
10 ‘a microprocessor’ does not require there be only one microprocessor, the subsequent
11 limitations referring back to ‘said microprocessor’ require that at least one
12 microprocessor be capable of performing each of the claimed [generating, creating,
13 retrieving, and generating] functions ... consistent with our precedent.” *Id.*²

14 The claims here are on all fours with those in *Varna* and *Salazar*. Even if “a
15 request ... including a key” in limitation (a) permits receiving multiple requests
16 including multiple keys, limitations (b)–(e) requires the same, single key (“the key”),
17 received in a single request, be used to locate both: (1) a first preview/portion of
18 video; and (2) a second segment of video. Plaintiff never alleges that Meta’s systems
19 operate this way, but instead asks the Court to adopt an “unreasonable” view of its
20 claims foreclosed by *Varna* and *Salazar*. *Varma*, 816 F.3d at 1362.

21 Even if the Court considered this claim construction (it is not), the Court may
22 still resolve this legal question on the pleadings because it requires looking no further
23

24 ² Although the *Salazar* court performed claim construction, the Federal Circuit
did not foreclose making such a plain-words determination on the pleadings.

1 than the claim itself, and Plaintiff identifies no subsidiary factual issues to address.
2 *UTTO Inc. v. Metrotech Corp.*, 119 F.4th 984, 993 (Fed. Cir. 2024) (“Where claims
3 are construed based on intrinsic evidence alone, a decision on claim construction ...
4 is proper and routine in ruling on a motion under Rule 12(b)(6)”; *Pemberton v. Jack*
5 *in the Box Inc.*, No. 24-CV-1179, 2026 WL 92047, at *8 (S.D. Cal. Jan. 13, 2026)
6 (dismissing with prejudice after construing the claims).

7 For this reason alone, Plaintiff’s claims should be dismissed, and any
8 continued assertion of these claims against Meta should be deemed futile.

9 **2. Plaintiff still fails to plausibly allege that Meta’s systems**
10 **include a database of reference keys**

11 Plaintiff’s complaint separately fails because Plaintiff *still* has not identified
12 anything to suggest that the accused products practice limitation (c). Although
13 Plaintiff’s charts identify a few of Meta’s product elements, nothing plausibly
14 suggests those elements involve a “database maintaining a plurality of reference
15 keys” as claimed, and Plaintiff’s conclusory allegations that they do are unsupported
16 by the documents it cites. Plaintiff simply *assumes* that because Meta has a content
17 distribution network that retrieves videos from cache, it must practice the claims.

18 Plaintiff first argues that it identified “a local cache of a video optimization
19 server [or *optimizer*]” by identifying “a multi-level caching hierarchy,” Opp. at 6, but
20 Meta did not challenge Plaintiff’s identification of “a local cache.”

21 Next, Plaintiff argues that it adequately identified a “query ... to a cache []
22 database” by alleging that Meta has “cache directories and key-value indexing (e.g.,
23 through BlockCache, RIPQ, Haystack or equivalent lookup systems) to manage
24 cached content across many edge and regional servers. The query asks whether an

1 optimized version of the requested source file, matching the given parameters,
2 already exists in the caching hierarchy.” Opp. at 6–7 (citing Dkt. 32-2 at 17; Dkt. 32-
3 8 at 16). Even accepting these statements as true, Plaintiff never ties these allegations
4 to its claims to sufficiently allege infringement. Although Plaintiff says the word
5 “key,” it offers no factual allegations as to what the supposed “key” in the “key-value
6 index” is, let alone that it is a set of “reference keys” that “correspond[] to a plurality
7 of optimized versions of source files stored on a plurality of other video optimization
8 servers [or *optimizers*]” and “specify[] parameters of an optimized version of a source
9 file,” as required by limitation (c). Dkt. 32-1 at 21 (cl. 1); Dkt. 32-7 at 21 (cl. 1).
10 Plaintiff simply ignores these elements.

11 Plaintiff’s identification of Meta’s “BlockCache,” “RIPQ,” and “Haystack”
12 frameworks and the extrinsic sources it cites do not fill in this gap or support the
13 possible existence of a “database maintaining a plurality of reference keys.” In its
14 charts, Plaintiff cites a single snippet from a webpage, which says only that
15 “Haystack” is an example of one of Meta’s “backend storage systems.” Dkt. 32-2 at
16 17; Dkt. 32-8 at 16. That snippet does not describe what Haystack is or how it
17 operates enough to even suggest that it involves a database of reference keys. *Id.*

18 Nor does the cited webpage support Plaintiff’s allegations that “BlockCache,”
19 “RIPQ,” and “Haystack” use “key-value indexing” with queries that “ask[] whether
20 an optimized version of the requested source file, matching the given parameters,
21 already exists.” Dkt. 32-2 at 17; Dkt. 32-8 at 16.³ Apart from the lone mention of
22 “Haystack” addressed above, that webpage explains that “BlockCache” and “RIPQ”

23 ³ The Court may consider the webpage cited and relied upon in complaint. *See*
24 *Robles v. Gojo Indus., Inc.*, No. SACV 21-928, 2022 WL 2163846, at *3 (C.D. Cal.
Mar. 16, 2022), *aff’d*, No. 22-55627, 2023 WL 4946601 (9th Cir. Aug. 3, 2023).

1 are frameworks that group files into fixed-size blocks, and prioritize blocks that are
2 frequently requested. *See* [https://research.facebook.com/blog/2016/4/the-evolution-](https://research.facebook.com/blog/2016/4/the-evolution-of-advanced-caching-in-the-facebook-cdn/)
3 [of-advanced-caching-in-the-facebook-cdn/](https://research.facebook.com/blog/2016/4/the-evolution-of-advanced-caching-in-the-facebook-cdn/) (Part II addressing “BlockCache”;
4 Part III addressing “RIPQ”). The website *never* mentions “key-value indexing” or
5 “databases,” or anything else that would suggest Meta’s system has a “database
6 maintaining a plurality of reference keys”. Plaintiff’s allegations that BlockCache,
7 RIPQ, and Haystack operate consistent with the claims are pulled from thin air.

8 Even if “details ... of Meta’s cache management system are proprietary,” Opp.
9 at 7, that does not excuse Plaintiff from presenting plausible allegations suggesting
10 Meta practices this limitation. Plaintiff’s cited cases support no such excuse.

11 Plaintiff first cites *K-Tech Telecommunications, Inc. v. Time Warner Cable,*
12 *Inc.*, 714 F.3d 1277 (Fed. Cir. 2013) to excuse its inability to plausibly identify a
13 database of reference keys. Opp. at 7. But there, the parties did not dispute that the
14 complaint sufficiently alleged *how* the defendants infringed, unlike here. *K-Tech*, 714
15 F.3d at 1285. Instead, the only dispute was whether the plaintiff was required to
16 identify by make and model number the exact pieces of the defendant’s proprietary
17 backend system that performed the allegedly infringing functions. *Id.* The court held
18 that plaintiff needed to demonstrate only that the defendant plausibly infringed
19 *somewhere*, even if the plaintiff did not know which exact system did it. *Id.*

20 Similarly, in *Windy City Innovations, LLC v. Microsoft Corp.*, 193 F. Supp. 3d
21 1109 (N.D. Cal. 2016), the parties did not dispute that the plaintiff had alleged “the
22 ways in which the Accused Instrumentalities meet claims of the Patents.” *Id.* at 1115.
23 Rather, the defendant argued the complaint identified too many products and asserted
24 too many claims, making it impossible for the defendant to identify which products

1 infringed which claims. *Id.* at 1114. Consistent with *K-Tech*, the court rejected these
2 arguments, finding that a plaintiff need not identify “which specific products
3 infringed on which specific claims.” *Id.* at 1115.

4 The inverse situation is present here. There is no dispute that Plaintiff has
5 identified specific elements in Meta’s network that it accuses of infringement (e.g.
6 BlockCache, RIPQ, and Haystack). But Plaintiff has not plausibly explained *how*
7 these elements infringe; the factual allegations Plaintiff makes are both unsupported
8 by the documents it cites, and fail to align with the language of the claims. Although
9 Plaintiff makes a final appeal to its allegation of what a “person of ordinary skill”
10 would understand—equating this to an “information and belief” pleading—Opp. at
11 8, Plaintiff ignores that even this allegation fails to allege the use of a “database
12 maintaining a plurality of reference keys,” but at best “a database containing
13 **information** relating the keys” with parameters and locations of video segments. Dkt.
14 32-2 at 16–17; Dkt. 32-8 at 15–16 (emphasis added); Motion at 12. The specificity
15 of this term demands specific allegations. *See Bot M8 LLC v. Sony Corp. of Am.*, 4
16 F.4th 1342, 1353 (Fed. Cir. 2021).

17 **3. Plaintiff reads “streaming” out of the claim**

18 According to Plaintiff, limitation (g)—which requires “streaming ... for
19 playback on the client device”—does not require “streaming” video from a server to
20 a client device, but can be met when a user hits play on a video on their device. Opp.
21 at 9. This view of “streaming” is contrary to both common sense (i.e., streaming a
22 movie from Netflix’s servers to a TV over the Internet), and Plaintiff’s patents, which
23 explain that the whole point of optimizing video is to *improve streaming over*
24 *networks to the client device*. *See, e.g.*, Dkt. 32-1 at 1:21–52.

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1 By arguing that “streaming” happens *on* a client device “during playback,”
2 Opp. at 9, Plaintiff is treating “streaming” and “playback” as the same thing when
3 the claims require both. Such treatment finds zero support in the patent, *see, e.g.*, Dkt.
4 32-1 at Abstract, 1:21–52, 2:27–29, 4:38–41, 8:21–25, 13:7–10, 13:51–14:12, and
5 must be rejected because a plaintiff cannot simply read terms out of its claims, *see,*
6 *e.g., Pemberton*, 2026 WL 92047, at *8 n.2; *Loyal-T Sys. LLC v. Am. Express Co.*,
7 800 F. Supp. 3d 580, 590 (S.D.N.Y. 2025); *Digit. Landscape Inc. v. Maui Jim USA,*
8 *Inc.*, No. 21-1174, 2022 WL 507653, at *5 (C.D. Ill. Feb. 18, 2022).⁴

9 Finally, Plaintiff’s footnote contention that Meta waived this argument by not
10 raising it in its first motion to dismiss is legally incorrect. Opp. at 9, n.3. “[O]nce the
11 plaintiff elects to file an amended complaint ... Courts in this Circuit ... have
12 permitted defendants moving to dismiss an amended complaint to make arguments
13 previously made and to raise new arguments that were previously available.” *Benson*
14 *Ave. Co. LLC v. ARRI Americas Inc.*, No. 2:24-CV-07209-SVW-RAO, 2025 WL
15 2684035, at *2 (C.D. Cal. Aug. 14, 2025) (cleaned up; citations omitted); *see also In*
16 *re WellPoint, Inc. Out-of-Network UCR Rates Litig.*, 903 F. Supp. 2d 880, 893 (C.D.
17 Cal. 2012) (collecting cases). *In re Apple iPhone Antitrust Litig.*, 846 F.3d 313 (9th
18 Cir. 2017) is inapposite, as it involved sequential motions to dismiss under different
19 subsections of Rule 12, not new arguments in response to new allegations in an
20 amended complaint in a second Rule 12(b)(6) motion, as here. *Id.* at 319–20.

21 **B. Plaintiff did not plausibly plead induced infringement**

22 Plaintiff continues to assert induced infringement, but if Plaintiff’s direct

23 ⁴ Even if this dispute involves claim construction, the Court may decide it.
24 *UTTO*, 119 F.4th at 993; *FBA Operating Co. v. ETN Cap., LLC*, No. 5:23-CV-505,
2024 WL 2926187, at *6 (E.D.N.C. June 10, 2024).

1 infringement claim fails, its induced infringement claim does too. *Limelight*
2 *Networks, Inc. v. Akamai Techs., Inc.*, 572 U.S. 915, 920–21 (2014). However,
3 induced infringement also does not cover the conduct that Plaintiff alleges, so its
4 claim should be dismissed regardless.

5 Direct infringement of a method claim requires that either the defendant
6 performs every step of the method, or a third party performs some steps but their
7 performance is directly attributable to the defendant. *See Akamai Techs., Inc. v.*
8 *Limelight Networks, Inc.*, 797 F.3d 1020, 1022 (Fed. Cir. 2015). Induced
9 infringement of a method claim requires that a *third party* performs every step of the
10 method (*i.e.*, the third party directly infringes), but the defendant induced the
11 performance. *See, e.g., Fortinet, Inc. v. Forescout Techs., Inc.*, 543 F. Supp. 3d 814,
12 836 (N.D. Cal. 2021); *Fitbit, Inc. v. Fitbug Ltd.*, No. 14 C 1267, 2015 WL 5302814,
13 at *5 (N.D. Ill. Sept. 9, 2015). There is no induced infringement when a defendant
14 performs some method steps, and induces third parties to perform others, because
15 there is no one party that performs *all* steps. *Limelight*, 572 U.S. at 922–23; *Cyph,*
16 *Inc. v. Zoom Video Commc'ns, Inc.*, 642 F. Supp. 3d 1034, 1046 (N.D. Cal. 2022).

17 Plaintiff does not identify any *third party* that performs all method steps (and
18 thus directly infringes). Although Plaintiff points to its allegation that Meta's users
19 "use [Meta's] video streaming services," Opp. at 10–11 (citing Dkt. 29, ¶¶ 11, 21),
20 this allegation does not plausibly suggest that Meta's users literally receive requests,
21 query databases, locate pieces of video, and stitch them together (limitations (a)–(f)).⁵
22 For these steps, Plaintiff points to *Meta's* network, servers, platforms, and software
23

24 ⁵ At best, Plaintiff appears to allege that Meta's users perform only limitation
(g) ("streaming ... during playback"). Dkt. 32, ¶¶ 11, 21; Opp. at 6–7. META-1039
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1 operated by Meta. See generally Dkt. 32-2; Dkt. 32-8. By failing to allege that Meta’s
2 users independently perform every claimed method step, its induced infringement
3 fails. See *Star Envirotech, Inc. v. Redline Detection, LLC*, No. 12-cv-01861, 2014
4 WL 12589111, at *4 (C.D. Cal. Oct. 30, 2014) (dismissing induced infringement
5 claim when plaintiff identifies nothing to suggest third parties separately performed
6 all steps); cf. *Broadband iTV, Inc. v. Hawaiian Telcom, Inc.*, No. CIV. 14-00169,
7 2014 WL 5580967, at *4 (D. Haw. Oct. 30, 2014).

8 Instead, Plaintiff argues that the underlying direct infringement is “the
9 performance of *certain steps* by others *under the direction and control of Meta*.”
10 Opp. at 10 (emphasis added). This argument fails for two reasons. First, if users
11 perform only “certain steps” (not all) then users do not directly infringe, and there is
12 no induced infringement. *Limelight*, 572 U.S. at 922–23. Second, if users perform
13 steps “under the direction and control of Meta,” then that is just a direct infringement
14 allegation *against Meta* (under the second option), not induced infringement.
15 *Akamai*, 797 F.3d at 1022. Under this view, if *Meta* is still the underlying direct
16 infringer, then Plaintiff is alleging that Meta induces itself, which finds no support in
17 the law. *C.R. Bard, Inc. v. Advanced Cardiovascular Sys., Inc.*, 911 F.2d 670, 675
18 (Fed. Cir. 1990) (requiring “another’s direct infringement”); cf. *Nncrystal US Corp.*
19 *v. Nanosys, Inc.*, No. CV 19-1307, 2022 WL 1091283, at *2 (D. Del. Apr. 12, 2022)
20 (“Defendant cannot induce itself to infringe”).

21 This is also why Plaintiff fails to allege any specific intent for its users to
22 infringe. Although Plaintiff argues that Meta intends for its users to infringe by
23 instructing them how to use its video platform, Opp. at 11–12, these allegations speak
24 only to an intent to “facilitate Facebook users to *playback videos from the Facebook*

1 **platform,”** *id.* (emphasis added). Playing video is relevant only to one aspect of one
2 claimed step (limitation (g)) of a multi-step method, and is not infringement alone.
3 That does not plausibly suggest Meta intended users to perform the rest of the claimed
4 method and infringe. *DSU Med. Corp. v. JMS Co.*, 471 F.3d 1293, 1306 (Fed. Cir.
5 2006) (inducement requires “specific intent to encourage **another’s infringement**”
6 (emphasis added)); *see also, e.g., Midwest Energy Emissions Corp. v. Arthur J.*
7 *Gallagher & Co.*, No. CV 19-1334, 2023 WL 7385103, at *1 (D. Del. Nov. 8, 2023)
8 (“The induced infringer must encourage the performance of every single step”).

9 **C. Plaintiff’s amended complaint should be dismissed with prejudice**

10 If the Court dismisses the complaint based on limitations (b)–(e) or (g), *see*
11 §§I.A.1, I.A.3, then leave to amend is unwarranted because Plaintiff’s claims would
12 be futile. The only way Plaintiff could state a claim is by contradicting its prior
13 allegations, which it cannot do. *See* Motion at 19.

14 Plaintiff points to the early stages of the proceedings and its past willingness
15 to drop claims that had no basis to be asserted as supporting granting leave to amend,
16 Opp. at 11–12, but those are not factors when considering whether to grant leave to
17 amend, *Eminence Cap., LLC v. Aspeon, Inc.*, 316 F.3d 1048, 1051–52 (9th Cir. 2003)
18 (providing factors). By failing to address the factors Meta raised, Plaintiff cannot
19 oppose them now. *Rasof v. Lyubovny*, No. 2:22-CV-08080, 2023 WL 4677027, at *5
20 (C.D. Cal. May 25, 2023) (“The failure to address an argument in opposition may
21 constitute a waiver of that argument”).

22 **II. CONCLUSION**

23 For the reasons set forth above, the Meta respectfully requests the Court
24 dismiss Plaintiff’s amended complaint in its entirety with prejudice.

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1 Dated: March 2, 2026

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DEFENDANT'S REPLY ISO MOTION TO DISMISS AMENDED COMPLAINT

CERTIFICATION OF COMPLIANCE WITH L.R. 11-6.2

The undersigned, counsel of record for Defendant, certifies that this brief contains 3,661 words (excluding the caption, the table of contents, the table of authorities, the signature block, and this certification), which complies with the word limit of L.R. 11-6.1, as well as the page-limit requirements of Dkt. 12, ¶3.A.

Dated: March 2, 2026

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DEFENDANT'S REPLY ISO MOTION TO DISMISS AMENDED COMPLAINT