

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOOM COMMUNICATIONS, INC.,

Petitioner,

v.

RICOH COMPANY, LTD.

Patent Owner.

Case No. IPR2026-00411
U.S. Patent No. 11,256,464

**PETITIONER'S MOTION TO FILE A CORRECTED PETITION AND
EXPERT DECLARATION PURSUANT TO 37 C.F.R § 42.104(c)**

PETITIONER's EXHIBIT LIST

No.	Reference	Referred To As
1001	U.S. Patent No. 11,256,464	'464 Patent
1002	Prosecution History of U.S. Patent No. 11,256,464	'464 Patent File History
1003	Declaration of Dr. Kevin Almeroth	Almeroth Decl.
1004	UK Patent Application Publication No. GB 2473463 A	Watson
1005	U.S. Patent No. 5,990,931	Nimri
1006	U.S. Patent No. 8,994,778	Weiser
1007	U.S. Patent Application Publication No. 2011/0271211	Jones
1008	U.S. Patent Application Publication No. 2010/0306674	Salesky
1009	U.S. Patent Application Publication No. 2010/0053341	Yi
1010	U.S. Patent Application Publication No. 2012/0154256	Grover
1011	Microsoft Office 2004 Review CNET, Available at https://www.cnet.com/reviews/microsoft-office-2004-for-mac-standard-edition-review/y .	Office 2004
1012	Redline Corrections to the Original Petition For <i>Inter Partes</i> review of U.S. 11,256,464	

1013	Redline Corrections to the Declaration of Dr. Kevin Almeroth	
1014	Corrected Petition For <i>Inter Partes</i> review of U.S. 11,256,464	
1015	Corrected Declaration of Dr. Kevin Almeroth	

I. THE REQUESTED RELIEF

This Motion is filed pursuant to 37 C.F.R §42.104(c) to correct typographical errors and clerical mistakes comprising incorrect pin citations to line and column numbers corresponding to cited exhibits in the Petition and the Declaration of Dr. Almeroth (EX1003). Petitioner requests leave to file a corrected version of the Petition and EX1003. Petitioner further requests that upon grant of the present Motion, the filing date of IPR2026-00411 remain unchanged.

II. APPLICABLE RULE

37 C.F.R. §42.104(c) states:

A motion may be filed that seeks to correct a clerical or typographical mistake in the petition. The grant of such a motion does not change the filing date of the petition.

Thus, Rule 42.104(c) permits the correction of a clerical mistake in a petition without a change in the petition's filing date. Indeed, this "rule is remedial in nature and is therefore entitled to a liberal interpretation." *See ABB Inc. v. ROY-G-BIV Corp.*, Case IPR2013-00063, Paper 21, at 7 (PTAB Jan. 16, 2013) (citing *Tcherepnin v. Knight*, 389 U.S. 332, 336 (1967)). The rule "facilitates the Board's goal of resolving *inter partes* reviews in a just, speedy, and inexpensive manner ... and benefits the public by providing a clearer record." *Netflix Inc., v. Copy Protection LLC*, Case IPR2015-00921, Paper 19, at 4-5 (PTAB July 30, 2015) (citing *FedEx Corp v. IpVenture, Inc.*, IPR2014-00833, Paper 12, slip. Op. 3. (PTAB Nov. 3,

2014)) (granting Petitioner’s request after Patent Owner filed a preliminary response).

The Board often grants Rule 42.104(c) motions where “Petitioner seeks only to correct clerical or typographical errors in the petition, namely to correct pin citations to line and column numbers corresponding to cited exhibits.” *Emerson Electric Co. v. SIPCO, LLC*, Case IPR2017-00260, Paper 10, at 2 (PTAB May 9, 2017) (allowing Petitioner to file a corrected Petition); *see also Shopify Inc. V. DDR Holdings, LLC*, Case IPR2018-01008, Paper 9, at 2-3 (PTAB Aug. 13, 2018) (granting Petitioner’s request to file a replacement version of the originally-filed Petition to correct errors in the exhibit list, table of authorities, citation to the expert declaration, and the listing of challenged claims where “there is approximately a month until the ... due date for filing a preliminary response.”); *Terumo BCT Inc. v. Haemonetics Corp.*, IPR2015-01391, Paper 18, at 2-3 (PTAB Feb. 4, 2016) (granting motion to file corrected petition including missing claim language analysis after patent owner filed its preliminary response).

III. FACTS RELEVANT TO THIS MOTION

Petitioner filed the Original Petition and Original Declaration of Dr. Almeroth (EX1003) on July 10, 2016. On August 2, Petitioner identified typographical citation errors and inadvertent transcription errors in Ground 2 in the original Petition and Declaration of Dr. Almeroth. On August 3, in the file where edits had been to Ground

2, Petitioner discovered an issue where changes were not saving in the document. On August 3, 2026, Petitioner requested leave to file this Motion. On August 4, 2026 authorization was given via email to file this motion. EX3101.

The Notice of Filing date issued on July 21, 2026. Paper 4. Patent Owner's preliminary response is not due until October 21, 2026.

Petitioner acted promptly upon noticing the errors—less than two weeks after the Notice of Filing Date issued and more than two months before Patent Owner's preliminary response is due. Paper 4. Given this timing, there is no prejudice to Patent Owner. Moreover, because the correction is limited to clerical and typographical citation and transcription errors only within Ground 2 and is being sought at a very early stage, granting this Motion will not delay the proceeding or alter any deadline. Further, granting this Motion will advance the Board's goal of resolving this proceeding in a just, speedy, and inexpensive manner while providing a clearer record for Patent Owner and the Board alike.

A Redline of the Original Petition is being filed contemporaneously as EX1012. A Redline of the Corrected Declaration of Dr. Almeroth is being filed contemporaneously as EX1013. The proposed Corrected Petition is being filed contemporaneously as EX1014 and the Corrected Declaration of Dr. Almeroth as EX1015.

IV. CONCLUSION

For the reasons set forth above, Petitioner respectfully requests permission to file the Corrected Petition and EX1003 so that the Board has the benefit of the correct evidentiary citations.

Dated: August 5, 2026

Respectfully submitted,

/s/ Amanda Streff Bonner

Amanda Streff Bonner
Registration No. 65,224
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
Telephone: 312-701-8645
Facsimile: 312-701-7711
asbonner@mayerbrown.com

B. Clayton McCraw
Registration No. 68,258
MAYER BROWN LLP
1221 Avenue of the Americas
New York, NY 10020-1001
Telephone: (212) 506-2649
CMcCraw@mayerbrown.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 5, 2026, I caused a true and correct copy of the Motion to File a Corrected Petition and Expert Declaration Pursuant to 37 C.F.R. §42.104(c) to be served via email to the following addresses:

Eagle H. Robinson Norton Rose
Fulbright US LLP 98 San Jacinto
Blvd., Suite 1100 Austin, TX
78701 512.536.3083 (telephone)
512.536.4598 (facsimile)
eagle.robinson@nortonrosefulbright.com

Michael V. Solomita Norton Rose
Fulbright US LLP 1301 Avenue of the
Americas New York, NY 10019
212.408.5420 (telephone)
michael.solomita@nortonrosefulbright.com

Chad Wallis Norton Rose Fulbright US
LLP 98 San Jacinto Blvd., Suite 1100
Austin, TX 78701 512.474.5201
(telephone) 512.536.4598 (facsimile)
chad.wallis@nortonrosefulbright.com

Dated: August 5, 2026

Respectfully submitted,

/s/ Amanda Streff Bonner

Amanda Streff Bonner
Registration No. 65,224
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
Telephone: 312-701-8645
Facsimile: 312-701-7711
asbonner@mayerbrown.com

B. Clayton McCraw
Registration No. 68,258
MAYER BROWN LLP
1221 Avenue of the Americas
New York, NY 10020-1001
Telephone: (212) 506-2649
CMcCraw@mayerbrown.com

Counsel for Petitioner