

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ZOOM COMMUNICATIONS, INC.,

Petitioner,

v.

RICOH COMPANY, LTD.

Patent Owner.

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Case No. IPR2026-00424  
U.S. Patent No. 10,909,059

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

**PETITIONER's EXHIBIT LIST**

| <b>No.</b> | <b>Reference</b>                                  | <b>Referred To As</b>         |
|------------|---------------------------------------------------|-------------------------------|
| 1001       | U.S. Patent No. 10,909,059                        | '059 Patent                   |
| 1002       | Prosecution History of U.S. Patent No. 10,909,059 | '059 Patent File History      |
| 1003       | Declaration of Dr. Kevin Almeroth                 | Almeroth Decl.                |
| 1004       | U.S. Patent No. 9,113,032                         | Vander Mey                    |
| 1005       | U.S. Patent App. Pub. No. 2010/0302346            | Huang                         |
| 1006       | U.S. Patent No. 6,573,926                         | Ichimura                      |
| 1007       | U.S. Patent App. Pub. No. 2006/0248210            | Kenoyer                       |
| 1008       | U.S. Patent No. 6,346,963                         | Katsumi                       |
| 1009       | U.S. Patent App. Pub. No. 2007/0291108            | Huber                         |
| 1010       | U.S. Patent App. Pub. No. 2008/0069011            | Sekaran                       |
| 1011       | U.S. Patent No. 8,769,001                         | Ohwada                        |
| 1012       | U.S. Patent No. 8,949,593                         | Nakagawa                      |
| 1013       | U.S. Patent No. 11,546,548                        | Kato '548                     |
| 1014       | U.S. Patent App. Pub. No. 2013/0169742            | Wu                            |
| 1015       | U.S. Patent App. Pub. No. 2014/0114664            | Khan                          |
| 1016       | Adobe Connect Enterprise User Guide               | Adobe User Guide              |
| 1017       | LifeSize Multipoint User Guide                    | LifeSize User Guide           |
| 1018       | GoToWebinar's 2012 Organizer Quick Start Guide    | GoToWebinar Quick Start Guide |

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|-------------|---------------------------------------------------------------------------------------------------------------|--|
| <b>1019</b> | <b>Redline Corrections to the Original<br/>Petition For <i>Inter Partes</i> review of U.S.<br/>10,909,059</b> |  |
| <b>1020</b> | <b>Redline Corrections to the Declaration<br/>of Dr. Kevin Almeroth</b>                                       |  |
| <b>1021</b> | <b>Corrected Petition For <i>Inter Partes</i><br/>review of U.S. 10,909,059</b>                               |  |
| <b>1022</b> | <b>Corrected Declaration of Dr. Kevin<br/>Almeroth</b>                                                        |  |

## **I. THE REQUESTED RELIEF**

This Motion is filed pursuant to 37 C.F.R. §42.104(c) to correct 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 IPR2026-00424 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 24, 2026. On July 30, Petitioner identified typographical citation errors in the original Petition and Declaration of Dr. Almeroth. The next day, July 31, 2026, Petitioner requested leave to file this Motion. On August 3, 2026

authorization was given via email to file this motion. EX3101. On this same day, the Notice of Filing Date issued. Paper 3. Patent Owner has not made an appearance yet in this proceeding, however, Petitioner copied Patent Owner's Counsel from another IPR between these same parties in its request to file this Motion.

Petitioner acted promptly upon noticing the errors—one week after filing. The Notice of Filing Date just issued setting the schedule for pre-institution briefing. Paper 3. Given this timing, there is no prejudice to Patent Owner. Moreover, because the correction is limited to clerical and typographical citation errors 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 EX1019. A Redline of the Corrected Declaration of Dr. Almeroth is being filed contemporaneously as EX1020. The proposed Corrected Petition is being filed contemporaneously as EX1021 and the Corrected Declaration of Dr. Almeroth as EX1022.

#### 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 3, 2026

Respectfully submitted,

/s/ Amanda Streff Bonner

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 3, 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:

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And via Mail to the Attorney of Record for Patent Owner at the following address:

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UNITED STATES

Dated: August 3, 2026

Respectfully submitted,

/s/ Amanda Streff Bonner

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