

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOOM COMMUNICATIONS, INC.,
Petitioner

v.

RICOH COMPANY, LTD.,
Patent Owner

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

**PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL OF INSTITUTION**

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PATENT OWNER'S EXHIBIT LIST

Exhibit	Shorthand	Description
2001		U.S. Patent No. 10,503,676
2002		Plaintiff Ricoh Company Ltd.'s Original Complaint for Patent Infringement [Dkt. 1], <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated August 29, 2025
2003		District Court's Opinion and Order Denying Defendant Zoom Communications, Inc.'s Motion to Dismiss [Dkt. 39] <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated May 1, 2026
2004		Docket Navigator listing of docket entries for <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , DDE-1-25-cv-01095 (accessed August 25, 2026).
2005		Scheduling Order [Dkt. 53], <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated June 15, 2026.

Patent Owner respectfully requests discretionary denial.

First, Patent Owner has strong settled expectations in the '059 Patent. The '059 Patent issued February 2, 2021, meaning it will have been in force for six years by the time of an institution decision. Further, constructive notice of the claimed subject matter extends beyond six years through the publicly accessible notice of allowance and the overlapping subject matter of a parent patent that issued in 2019.

Second, Petitioner had ample opportunity to timely challenge the '059 Patent, but chose delay. Petitioner was notified in writing of its infringement of the '059 Patent over two years before filing the instant Petition, which came roughly eleven months after Petitioner was served with Patent Owner's Complaint. Rather than prepare and file its petition promptly after *either* of these events, Petitioner first asked the district court to invalidate all claims as patent ineligible. Only after the Court denied Petitioner's § 101 challenge in a detailed, 58-page opinion did Petitioner turn to the PTAB. And the Petition strategy—forgoing a stipulation and relying on implicit claim construction positions—almost guarantees inconsistencies between the Board and the Court.

Finally, Petitioner advances weak challenges based on prior art that does not disclose several claim elements. Petitioner tries to fill the gaps in the prior art in ways that are legally foreclosed—relying on expert testimony to supply a missing

claim limitation and advancing uncorroborated conclusory assertions that cannot meet Petitioner's burden of proof.

Petitioner's weak challenges, gamesmanship, and tactical delay should not be rewarded with institution.

I. SUMMARY OF PERTINENT FACTS

The '059 Patent issued from an application that first published February 13, 2020, as US 2020/0050567 A1. *See* EX1001, 1/49 (§(65) Prior Publication Data). The '059 Patent claims priority to an earlier U.S. patent application which first published in 2017 and ultimately issued in 2019. *See id.*, 1-2/49 ((§63) Related Application Data); EX2001. The '059 Patent issued February 2, 2021. EX1001.

On April 11, 2024, Patent Owner notified Petitioner of the '059 Patent and its relevance to Petitioner's products, services, and software. EX2002, 9.

On August 29, 2025, Patent Owner sued Petitioner for infringement of seven patents, including the '059 Patent. EX2002, 4, 16-23.

Petitioner moved to dismiss, asking the Court to invalidate all asserted patents, including the '059 Patent, under 35 U.S.C. § 101. EX2003, 4-5. Patent Owner responded by amending its complaint. EX2003, 5.

Petitioner then renewed its motion to dismiss, again asking the Court to invalidate the asserted patents under § 101. EX2003, 5. After full briefing, on April 1, 2026, the Court conducted oral argument. EX2004, 3-4.

On May 1, 2026, the Court denied Petitioner's Motion with a detailed, 58-page opinion analyzing the asserted patents, representative claims, and their respective improvements over conventional technology. EX2003, 2, 9-56.

On July 24, 2026, Petitioner filed its IPR Petition against the '059 Patent. Then on August 18, 2026, Petitioner filed a corrected IPR Petition to fix several errors found in its original IPR Petition.

II. STRONG SETTLED EXPECTATIONS FAVOR DENIAL

A. At institution, the '059 Patent will have been in force for six years

Patent Owner has strong settled expectations of its rights in the '059 Patent. The '059 Patent issued on February 2, 2021, and, at the time an institution decision is expected on January 25, 2027, will have been in force for six years. *See* EX1001, 1/49. The Board has routinely held that patents in force for six years have "strong settled expectations." *Kahoot! AS v. Interstellar Inc.*, IPR2025-00696, Paper 12 at 2 (July 31, 2025) (patent "in force for over six years" creates strong settled expectations); *Amgen Inc. v. Bristol-Myers Squibb Co.*, IPR2025-00601, Paper 9 at 3 (July 24, 2025) (patent in force for six years creates strong settled expectations). Absent persuasive reasoning from a petitioner, it is not an appropriate use of resources to review a patent in which a patent owner has developed settled expectations. *Dabico Airport Sols. Inc. v. AXA Power ApS*, IPR2025-00408, Paper

21, 2-3 (Director June 18, 2025) (informative). Petitioner provides no such persuasive reasoning here.

B. The claims as issued will have been public for over six years

The strength of Patent Owner’s settled expectations is further underscored by the extensive public notice of the ’059 Patent and its patent family. The Director has explained that settled expectations rest on constructive, not actual, notice. *Dabico*, IPR2025-00408, Paper 21, 3 (“actual notice of a patent or of possible infringement is not necessary to create settled expectations”). Here, public notice of the ’059 Patent extends over six years. U.S. Pat. Pub. No. 2020/0050567 A1 (the ’567 Publication), which issued as the ’059 Patent, was published in February of 2020—six years and six months before the filing of the corrected Petition. EX1002, 176 (Notice of Publication). As this application was publicly available, it “provide[d] notice to the public.” *See Dabico*, Paper 21, 3.

Further, the issued claims of the ’059 Patent were finalized as of June 2020—over six years before the filing of the corrected Petition. *Compare* EX1002, 201-203 (claims at response to NFOA) *with* EX1001, 49 (patented claims); *see also* EX1002, 252 (not amending claims in response to FOA). The USPTO also issued a notice of allowance in September of 2020. EX1002, 274. While not in the ’567 Publication itself, these identical claims were publicly available via Public PAIR

(now Patent Center), such that Petitioner will have had constructive notice of the claims of the '059 Patent for over six years by the time of institution.

C. Publication of the '059 Patent's family dates back to 2019

The '059 Patent is the second in a continuation-only series of patents. The parent patent—issued in 2019—has not been challenged. As such, Patent Owner's expectations around this technology are well-settled for this patent family. *See Samsung Elecs. Co. & Samsung Elecs. Am., Inc. v. GenghisComm Holdings, LLC*, IPR2025-00780, -781, Paper 11, 2 (Acting Dir. Aug. 22, 2025) and *Samsung Elecs. Co. & Samsung Elecs. Am., Inc. v. GenghisComm Holdings, LLC*, IPR2025-00792, -793, Paper 12, 2 (Aug. 22, 2025) (holding “strong settled expectations for Patent Owner” in patents that had been in force for as little as three years because “essentially the same discretionary considerations” that existed for co-owned patents “in force for approximately eight and six years” also existed with respect to the younger patents).

The '059 Patent is a continuation of U.S. Pat. No. 10,503,676 (the '676 Patent) that published in January of 2017 and issued in December 2019 (nearly 7 years ago). In addition to sharing priority, the claims of the '059 Patent also recite subject matter that is related to that claimed in the '676 Patent. *See* EX1001, 10:62-11:15 (claiming “transmission terminal” and “processor” for displaying “information concerning a total number of transmission terminals participating in the video conference” and

discussing operations where a number of the sets of image data to display on the screen of the transmission terminal “is smaller than the total number of transmission terminals”); EX2001, 35:12-40 (claiming “transmission terminal” and “processor” for displaying “the total number of transmission terminals that are participating in the video conference” and discussing operations where a “a number of transmission terminals that are participating in a video conference is greater than a maximum number of transmission terminals that can be displayed”).

Given the related subject matter and considerably longer tenure of the parent patent, which remains unchallenged, Patent Owner has “strong settled expectations” in this entire patent family, of which the ’059 Patent is just one part.

III. PETITIONER’S ACTIONS FAVOR DENIAL

A. Petitioner’s strategic delay favors denial

Petitioner filed its corrected Petition: nearly *seven years* after the parent ’676 Patent issued (EX2001), *six years* after the claims of the ’059 Patent were finalized (EX1002), over *five years* after the ’059 Patent issued (EX1001), over *two years* after Petitioner received written notice of its infringement of the ’059 Patent (EX2002, 9), nearly *one year* after Petitioner was sued for infringing the ’059 Patent (EX2004), and nearly *three months* after the district court denied Petitioner’s § 101 challenge (EX2004). Petitioner could have filed an IPR petition at any of multiple points along that timeline, for example, within a reasonable time after receiving the

April 2024 letter from Patent Owner identifying the relevance of the '059 Patent to Petitioner's own products. But Petitioner waited.

“The purpose of AIA reviews was, and is, to provide a quick and cost-effective *alternative* to district court patent litigation for resolving disputes over patent validity.” *See Magnolia Medical Technologies v. Kurin*, IPR2026-00097, Paper 17, 2 (PTAB May 14, 2026) (Precedential) (emphasis in original). Petitioner's actions deprived the PTAB of any chance of realizing that purpose here.

Petitioner did not seek *inter partes* review as a quick and cost-effective alternative for resolving this dispute. Petitioner instead elected to delay filing—creating unnecessary risks of overlap with the district court—until the last possible moment. Indeed, Petitioner first asked the district court to invalidate the patent, and only after being disappointed by the Court's refusal to do so (and a further three-month delay) did Petitioner look to the PTAB for a different answer. Petitioner here seeks IPR “as a means by which the petitioner presents additional invalidity arguments under sections 102 and 103” and to force “the parties [to] spend more time and resources litigating patent validity than they would have in the absence of AIA review.” *Magnolia Med. Techs.*, IPR2026-00097, Paper 17, 3. While not expressly prohibited, that strategy—of delay, wait-and-see, and then use the PTAB for a second bite at the apple that increases “time and resources”—is antithetical to the policy goals articulated in *Magnolia Med. Techs.*

B. Petitioner’s failure to avoid overlap and inconsistency favors denial

Petitioner offers nothing to protect against the overlap and risk of inconsistent rulings inherent in the timing of its Petition. To start, Petitioner provides no stipulation to address the inevitable overlap of issues between the Board and the District Court. *Phison Elecs. Corp. v. Vervain, LLC*, IPR2025-00213, Paper 14, at 3 (P.T.A.B. July 10, 2025) (Director Review) (“The absence of such a stipulation tips the balance in favor of discretionary denial.”); *Charter Commc’ns, Inc. v. Iarnach Techs. Ltd.*, IPR2025-00473, Paper 14, at 2 (P.T.A.B. July 16, 2025) (Director Review) (same); *DataDome S.A. v. Arkose Labs Holdings, Inc.*, IPR2025-00693, Paper 13, at 3 (P.T.A.B. Aug. 14, 2025) (Director Review) (no stipulation “weighs in favor of discretionary denial”). By foregoing any stipulation, Petitioner shows that it will continue to fight patent validity at the district court. Thus, this Petition is clearly being used as an “*addition* to, not an *alternative* to, the litigation”—inconsistent with the purpose of AIA reviews. *Magnolia*, IPR2026-00097, Paper 17, 3-4.

Moreover, Petitioner has not sought a stay or asserted that it will do so. Even so, the court is highly unlikely to grant a stay before institution (the ’059 Patent is one of seven patents Petitioner challenges via IPR Petitions, the last of which would not be instituted before March of 2027). *See Omni MedSci., Inc. v. Whoop, Inc.*, No. 25-140, 2025 U.S. Dist. LEXIS 264946, *6-7 (D. Del. Dec. 23, 2025) (“The general

rule. . . is . . . that stays are almost never granted before [IPR] review is instituted.”) (citation omitted); *Ddrops Co. v. MOM Enterprises, LLC*, C.A. No. 22-332-GBW, D.I. 108 (D. Del. Aug. 25, 2023) (oral order) (“[b]ecause no institution decision has yet been issued, the Court will decline to stay the case until it hears from the PTAB.”). Further, given that there are seven asserted patents, a complete stay of litigation remains highly unlikely absent institution of IPRs against *all seven* asserted patents.

Petitioner’s litigation strategy also deprives the Board of the ability to avoid inefficiency or the risk of inconsistent positions. For example, Petitioner’s § 101 Motion forced the Court to invest substantial resources studying all seven asserted patents—including the ’059 Patent—to issue its detailed, 58-page opinion declining Petitioner’s request to invalidate their claims. *See* EX2003. The pursuit of that substantive motion at the pleading stage was certainly Petitioner’s choice to make, but it ensured Petitioner has not yet needed to take any formal claim construction or prior art positions in the litigation, or even produce invalidity contentions, as of the filing of this brief. Thus, through its own delay, Petitioner engineered circumstances by which—despite already having taken, and missed, a shot at validity—it can also take a shot at an IPR before having to crystallize any prior art litigation positions.

Petitioner’s IPR strategy only increases this risk of inconsistent positions between the Board and the district court. Although “Petitioner contends that no

constructions are necessary” (Pet., 15), its invalidity challenges explicitly advance constructions of the claim terms. Pet., 28-29 (asserting the claimed phrase “information concerning a total number” means “any information relating to the total number of participants” because “[t]he word ‘concerning’ is broad and relational”). Thus, Petitioner ostensibly contends no claim construction is needed despite its invalidity theories being predicated on a particular construction. This implicit claim construction opens the door for Petitioner to advance different constructions (either explicitly or implicitly) in the district court immediately after an institution decision is expected. If Petitioner's implicit construction of “concerning” is adopted by the Board but rejected by the district court (or vice versa), the parties face directly inconsistent rulings on the same claim term. This is precisely the kind of inconsistency the Director’s § 314(a) policy is designed to prevent.

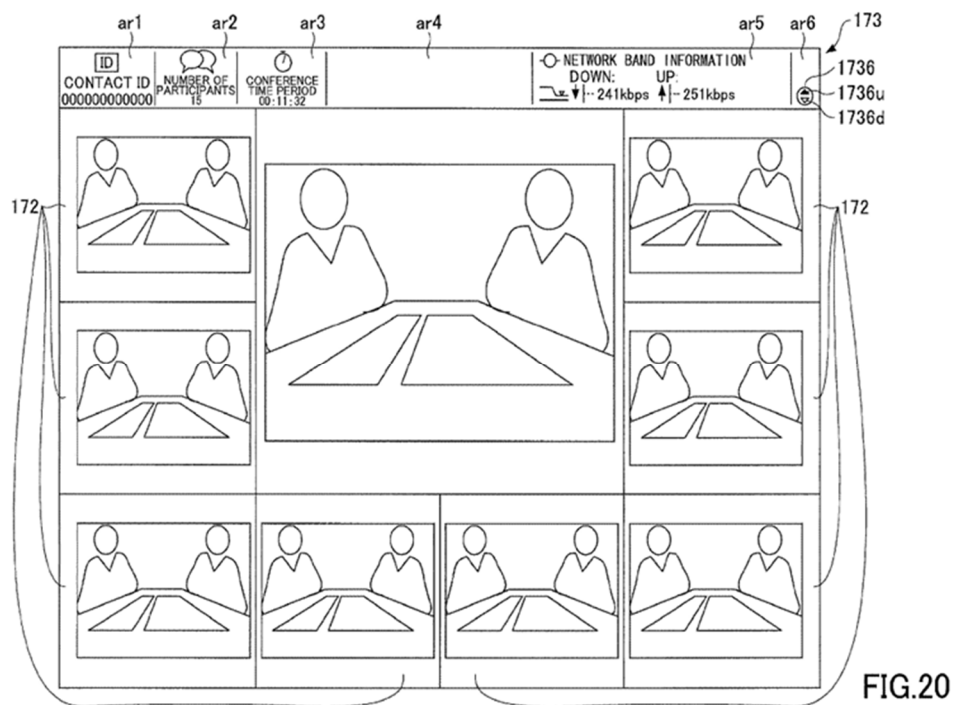
Coupled with its delayed filing strategy and previous validity challenge at the district court, Petitioner’s failure to mitigate any overlapping issues or duplicative efforts proves this Petition is the result of gamesmanship and not a true “alternative” to litigation.

IV. PETITIONER’S WEAK CHALLENGES FAVOR DENIAL

In addition to Patent Owner’s strong settled expectations and Petitioner’s gamesmanship, the Petition’s invalidity analysis is deficient. As will be explained in more detail in the POPR, each of the Petition’s grounds fails to establish that all

elements of the independent claims are disclosed or rendered obvious by the prior art. Specifically, the Petition’s analysis of **Limitations [1.a]/[3.a]/[4.a]/[6.a]**—which recite “processor processing circuitry configured to display on a screen of the transmission terminal, information concerning a total number of transmission terminals participating in the video conference”—is deficient for all proposed grounds.

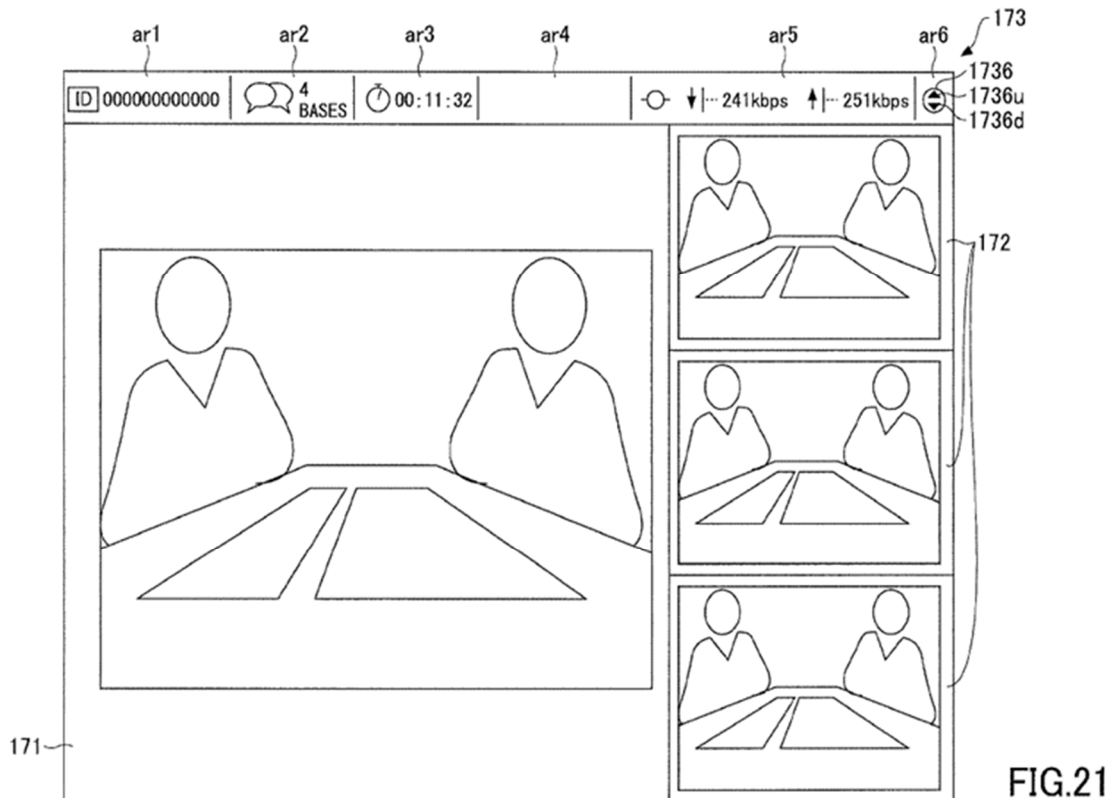
FIG. 20 of the ’059 Patent (inset below), shows a display for a scenario in which “the number of images displayed in the full screen display mode is different from the number of bases displayed in the second area ar2.” EX1001, 25:27-30.



“In FIG. 20, while the number of images displayed in the full screen display mode is ‘9’, the number of bases displayed in the second area ar2 is ‘15’. Thus, even when

the number of bases that have participated in a video conference exceeds the display upper limit, the user can know the number of bases that have participated in the video conference at a glance.” EX1001, 25:27-36.

FIG. 21 illustrates another example in which the auxiliary area 173 is shown in a “simple display manner,” and “information concerning what is displayed in each area” is depicted in ar1-ar5. *Id.*, 26:1-12.



While depicting an example in which the number of displayed sets of image data from participating transmission terminals is the same as the total number of participating transmission terminals, FIG. 21 is consistent in its depiction of

“information concerning a total number of transmission terminals participating ...”
in region ar2 as a number of bases participating in a conference (“4 BASES”). *Id.*

A. Ground 1: Vander Mey Alone (EX1004)

For Ground 1, Petitioner relies solely on Vander Mey’s disclosure that overlay 94 “include a list of participants.” Pet., 27. Petitioner states that this list of participants “conveys participant-count information because the user can determine total count of participants to the user” (e.g., “Alice, Bob, Charles, Dave, Eve, and Frank conveys a six participant conference”). Pet., 28.

Petitioner contends that this list of participants meets the claimed “information concerning a total number of transmission terminals participating in the video conference” because the claim merely requires “*any* information relating to the total number of participants.” Pet., 28 (emphasis added). Petitioner provides no intrinsic or extrinsic evidence for this claim construction (“information concerning” → “any information relating to”) outside of the conclusory statement that “[t]he word ‘concerning’ is broad and relational.” Pet., 28. This bare conclusory assertion cannot carry Petitioner’s burden. *In re Magnum Oil Tools Int’l, Ltd.*, 829 F.3d 1364, 1380 (Fed. Cir. 2016) (A petitioner cannot prove obviousness with “mere conclusory statements.”).

Further, Vander Mey fails to disclose the claimed feature. In the ’059 Patent the “information concerning” the “number of bases” (number of participants) can be

ascertained “at a glance.” EX1001, 24:64-25:10, 25:25-31, 25:63-26:6, FIGs. 18-21 (depicting information in second area “ar2”). Vander Mey’s participant list, on the other hand, would require a user to move and tally the user list to determine a total number of transmission terminals participating in the video conference. Pet., 28.

As shown below, Vander Mey’s overlay 94 is very small as it is displayed over image data of a participant. See EX1004, FIG. 4.

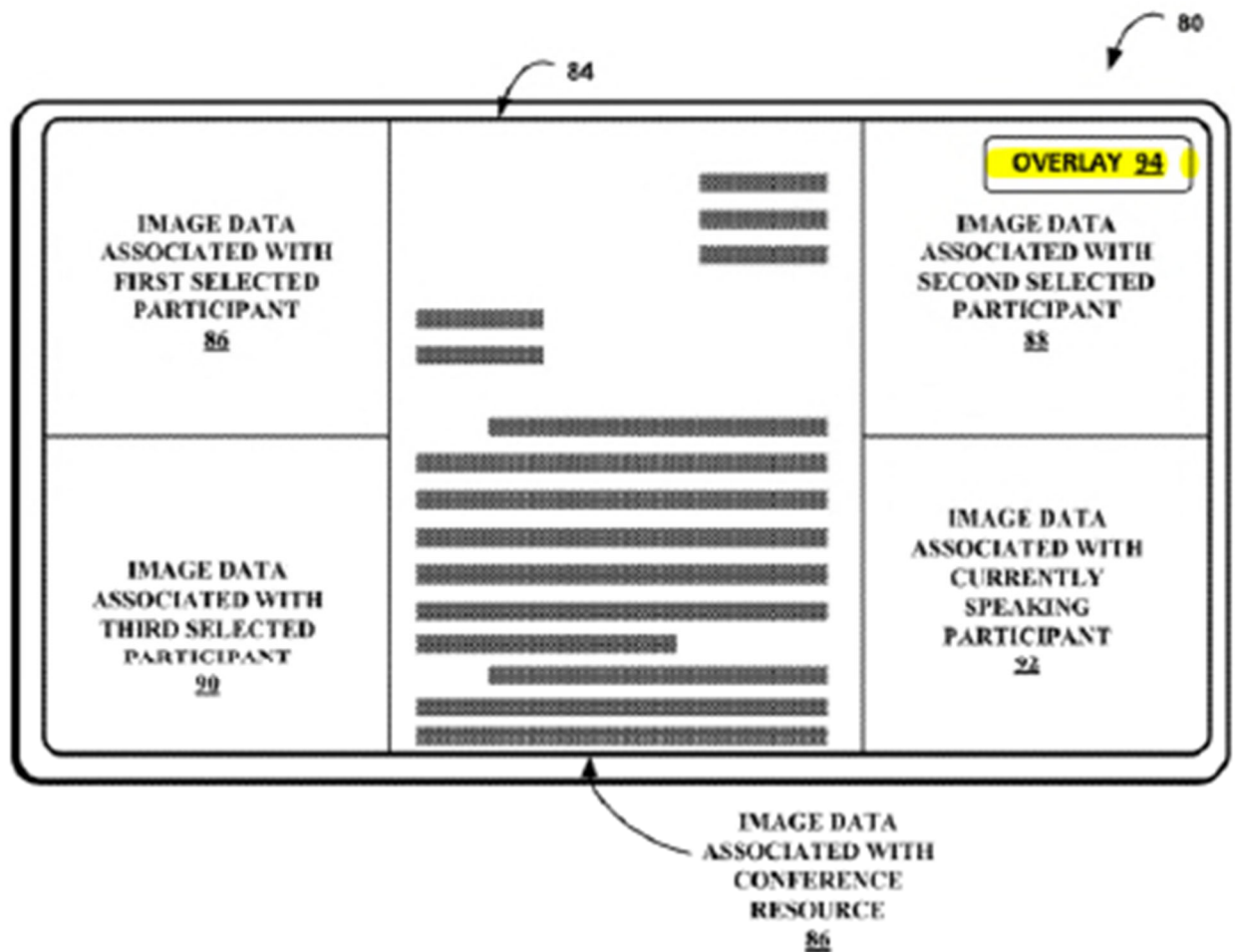


FIG. 4

EX1004, FIG. 4 (annotated by Petitioner); Pet., 28. A list of six participants would not fit in overlay 94 and, thus, a user would need to manipulate the overlay (e.g., via scrolling or zooming) to even be able to count the participants. *See id.*

Even accepting Petitioner’s unsupported claim construction position, Vander Mey’s overlay 94 as shown does not display even enough information for a user to derive a total number of participating users or transmission terminals. Under Petitioner’s theory, even being able to count participants would therefore require the user interact with the GUI to scroll through a listing of participants and therefore *modify* what is displayed. Thus, at no moment in time would overlay 94 ever display sufficient information for a user to even derive the total number of participants. This does not meet the claimed display of “information concerning a total number of transmission terminals participating in the video conference” as it would be understood within the context of the ’059 Patent. *See e.g.*, EX1001, 24:64-25:10, 25:25-31, 25:63-26:6, FIGs. 18-21. Thus, Vander Mey does not anticipate the claims of the ’059 Patent. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989) (“The identical invention must be shown in as complete detail as is contained in the ... claim.”); *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008) (“[b]ecause the hallmark of anticipation is prior invention, the prior art reference—in order to anticipate under 35 U.S.C. § 102—must not only

disclose all elements of the claim within the four corners of the document but must also disclose those elements ‘arranged as in the claim.’”).

Recognizing the gaps in Vander Mey, Petitioner invokes inherency and obviousness theories to arrive at the claimed features. However, each theory is legally deficient. For its inherency theory, Petitioner asserts that the “total number of transmission terminals participating in the video conference is inherent in the displayed list.” Pet., 29¹. This inherency theory relies on the same “list of participants” phrase as pointed to in its explicit anticipation theory, and is deficient for the same reasons. For its obviousness theory, Petitioner relies on expert testimony to fill the missing claim limitation. Petitioner’s reliance on expert testimony—rather than a patent or printed publication—to supply the missing claim limitation is in violation of Rule 104(b)(4). Memorandum re Enforcement and Non-Waiver of 37 C.F.R. § 42.104(b)(4) And Permissible Uses of General Knowledge In Inter Partes Review (July 31, 2025) (July 2025 Memorandum) at 1. Thus, the Board “shall deny” institution based on Petitioner’s obviousness theory. *Id.*

¹ Petitioner misapplies the inherency framework. Inherency requires showing that the claimed feature is necessarily present in Vander Mey; whereas Petitioner asserts that Vander Mey’s participant list necessarily meets the claim language.

B. Ground 2: Huang (EX1005)

FIG. 3 of Huang (cropped and inset below), shows a Section 2 that includes “a list of participants and their respective video images” along with a page navigation interface (e.g., 1, 2, ... 10, next). EX1005, [0025].

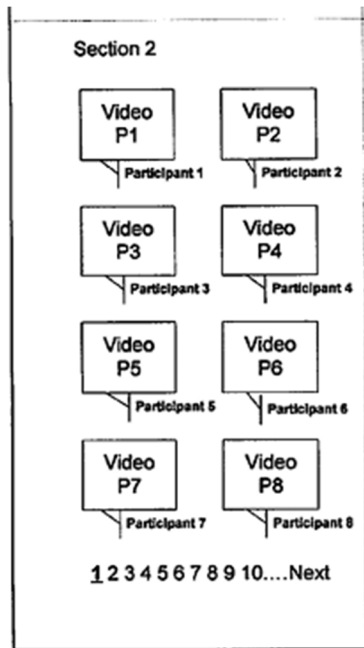


FIG. 3 Page I

Petitioner contends that the Section 2 display meets the display of the claimed “information concerning a total number of transmission terminals participating in the video conference” because “[a] user who sees page indicators and knows that each page displays 8 participants can ascertain the approximate total number of conference participants.” EX1003, ¶117. Petitioner provides an example based on the above image, where “12 pages of 8 participants each communicates a conference of *approximately* 100 participants.” Pet., 45.

Huang's display does not disclose the claimed feature as the total number of pages cannot be determined, let alone the total number of participants. Petitioner concedes as much, asserting a user can only determine "the *approximate* total number" of participants. As shown in FIG. 3 (above), Section 2 provides a list of eight participants and a page count of *at least* 10. EX1005, FIG. 3 (10....Next). This page count provides no indication as to whether the non-depicted pages are completely filled (8 participants) or only partially filled (1-7 participants). For example, the Section 2 display of FIG. 3 could indicate that there are 73 participants (9 pages with 8 participants and page 10 having only one participant) or 100 participants (12 pages of 8 participants, where page 11 and 12 are not being shown). Such an ambiguous and wide discrepancy does not meet the claimed display of "information concerning a total number of transmission terminals participating in the video conference." See EX1001, 24:64-25:10, 25:25-26:6, FIGs. 18-21.

Petitioner's obviousness theory relies on expert testimony to fill the missing claim limitation and is in violation of Rule 104(b)(4). July 2025 Memorandum, 1. Such a theory is insufficient for institution of *inter partes* reviews under the current rules. *Id.* (the Board "shall deny" institution).

C. Ground 3: Vander Mey in View of Ichimura

With neither Vander Mey nor Huang disclosing Limitations [1.a]/[3.a]/[4.a]/[6.a], Petitioner turns to Ichimura for information concerning a total

number of participating transmission terminals. Petitioner's theory rests entirely on an unsupported, unexplained assumption about a single phrase in Ichimura regarding the "number and profiles of the participants."

Specifically, Petitioner relies on a single passage of Ichimura: that conference means 25 of a local terminal "displays the number and profiles of the participants currently attending the conference." EX1006, 6:33-35. Petitioner assumes this means the total number of participants, but Petitioner and Dr. Almeroth overlook the rest of Ichimura's disclosure suggesting that the total number of participants is *not* transmitted to other terminals (and thus not available for display on the terminals).

For example, Ichimura describes its operation when a second participant joins a conference. Conference control means 15 "adds one to the value of the participant number storage section 102 to make the value two (step S5)." EX1006, 11:17-18. "Then, it transmits the participation permissive notification including the participant identifier IDPc and the participant identifier IDPb of the participant Pb already attending the conference to the conference means 25c of the terminal 3." *Id.*, 11:18-23. As shown in Ichimura's FIG. 1, the conference control device is distinct from the conference terminals. Yet, Ichimura describes sending participant identifiers IDPb, IDPc to the terminals, *not* the total number of participants. Indeed, Ichimura indicates "conference means 25" of the local terminal that "displays the number and profiles of the participants" does not even have access to the total

number of participants. EX1006, 4:28-5:10 (total number 102 stored in storage section 16 of conference control device 1, not local terminals 2, 3, or 4).

The numbering of participants without displaying a total number of participants is also consistent with other art, *e.g.*, Huang, which numbers participants Participant 1, Participant 2, etc. *See* EX1005, FIG. 3 (showing “P1” through “P8”).

Petitioner and its expert do not analyze Ichimura, instead assuming the only cited phrase refers to a total number of participants. But assumptions cannot satisfy Petitioner’s burden. *In re Magnum Oil*, 829 F.3d 1364, 1376 (“no burden shifts from the patent challenger to the patentee. This is especially true where the only issues to be considered are what the prior art discloses”). Merely showing participant numbers with profiles is not information concerning a total number of participants.

For these reasons, the Petition fails to show that any combination of Vander Mey and Ichimura would result in a “processor processing circuitry configured to display on a screen of the transmission terminal, information concerning a total number of transmission terminals participating in the video conference.”

V. CONCLUSION

For the foregoing reasons, institution should be denied.

Dated: October 5, 2026

Respectfully submitted,

/Eagle H. Robinson/
Eagle H. Robinson
Reg. No. 61,361

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 5, 2026, complete copies of the foregoing Patent Owner's Request for Discretionary Denial of Institution and EX2001-EX2005 were served on Petitioner via email (by consent), at the following email address(s):

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/Eagle H. Robinson/

Eagle H. Robinson (Reg. No. 61,361)