

UATP IP, LLC,
v.
Slick Slide LLC

PGR2024-00054

U.S. Patent No. 11,998,854

Patent Owner's Demonstratives
January 21, 2026

Instituted Grounds

PGR2024-00054 ('854 Patent)			
Ground	Claims Challenged	Basis	Applied References
1A	1-4, 6-7	§§ 102/103	Phillips
1B	1-4, 6-7, 14-17, 22-28	§ 103	Phillips in view of WN0400
2A	1-7	§ 103	Phillips in view of Fallgatter
2B	1-7, 14-17, 22-28	§ 103	Phillips and Fallgatter in view of WN0400
3A	8-13	§ 112(a)	Enablement
3B	5, 26	§ 112(b)	Indefiniteness

Petition at 11

There is No Evidence of CoF for WN0400

- No evidence in the Petition (Paper 2, 43; EX1006)
- EX1009 is for “mesh nylon bolting fabric,” not WN0400 (EX1009)
- No evidence of which type of mesh WN0400 is (EX1003)

The Lowest CoF for Mesh is Outside the Claimed Range

- The lowest CoF for any mesh is 0.26 (EX1009, Table 2, Fabric No. 15)
- Petitioner's expert: EX1009 does not reflect friction characteristics comparable to the '854 Patent (EX2029, 113:1-116:19)
- Patent Owner's expert agrees (EX2030, ¶¶22-25)
- No other CoF data relates to mesh (EX1021; EX1026; EX1027)
- Petitioner's expert: Non-mesh CoF data cannot be relied upon to demonstrate CoF of mesh (EX2029, 67:23-73:1; 109:21-110:19)

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- Experts agree that lower CoF is the “primary objective” (EX1003, ¶37)

Q So in order to achieve the primary objective of increased speed, a person of skill in the art wants the coefficient of friction to be lower; correct?

A Yes.

EX2029, Dr. Wang Deposition 46:17-21

- The goal of the '854 patent is lower CoF (EX1001, 1:26-32)

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- No evidence of a CoF of mesh within the claimed range (EX1009, Table 2, Fabric No. 15)

Fabric No.	Table 2—Frictional properties of textured and monofilament fabrics					
	Fabric-to-Fabric		Fabric-to-Leather		Fabric-to-Metal	
	$(F/N)_s$	$(F/N)_k$	$(F/N)_s$	$(F/N)_k$	$(F/N)_s$	$(F/N)_k$
13	0.375	0.349	0.642	0.575	0.250	0.244
14	0.358	0.276	0.618	0.564	0.298	0.283
15	0.292	0.260	0.406	0.397	0.229	0.225

EX1009, Table 2

- No evidence of CoF for WN0400 (Paper 2, at 43; EX1006)

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- POSITA would only look to materials/morphology with a demonstrated CoF lower than 0.2 (EX2029, 46:22-47:22; 52:21-53:16; 66:20-67:7)
- Experts agree that, if a higher CoF, modification would not be considered (for any reason) (EX2029, 46:22-47:11; 67:2-14)

Q The goal is to have a faster slide, and so a person of skill in the art is going to look to materials that have a coefficient of friction at least lower than 0.2?

MR. ROZYLOWICZ: Objection. Scope.

A Yes.

Q And in the same respect, a person of skill in the art trying to achieve the goal of the 854 patent of a faster slide would not look to morphologies that have a higher coefficient of friction than 0.2; correct?

MR. ROZYLOWICZ: Objection. Scope.

A Yes.

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- Extensive manufacturing steps are required and are unaddressed by Petitioner (EX2026, ¶¶207-214; Paper 2, 25, 36-43)

“a POSITA would not have known to make the combination, and Dr. Wang’s suggestion otherwise is wrong and unsupported. That is because in order to adhere a woven fabric, monofilament, or mesh to the bottom of a ride vehicle, processing of the bottom of the ride vehicle would be required...the bottom of the ride vehicle would need to be etched or scored, or put through a carefully designed adhesion process, to ensure proper affixing without compromising the low friction surface, assuming that would be even possible.”

EX2026, Dr. Spiegelberg Declaration, ¶207

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- Experts agree that adhesive will permeate (EX2029, 16:16-18, 51:6-52:9, 83:21-84:9; EX2031, ¶¶18-19; EX2030, ¶¶17-18)

“Bonding the mesh to the frames requires that the adhesive penetrate through the mesh, thereby surrounding the filaments or yarns to ensure a strong bond.”

EX2026, Dr. Spiegelberg Declaration, ¶208

Q Okay. In any event, though, the epoxy permeates through the fibers?

MR. ROZYLOWICZ: Objection. Scope.

A Yeah. Among the fibers.

EX2029, Wang Deposition 83:21-24

A Yeah. Sorry. Epoxy doesn't get inside the fiber, just, you only get inside the fabric, so surrounding the fibers.

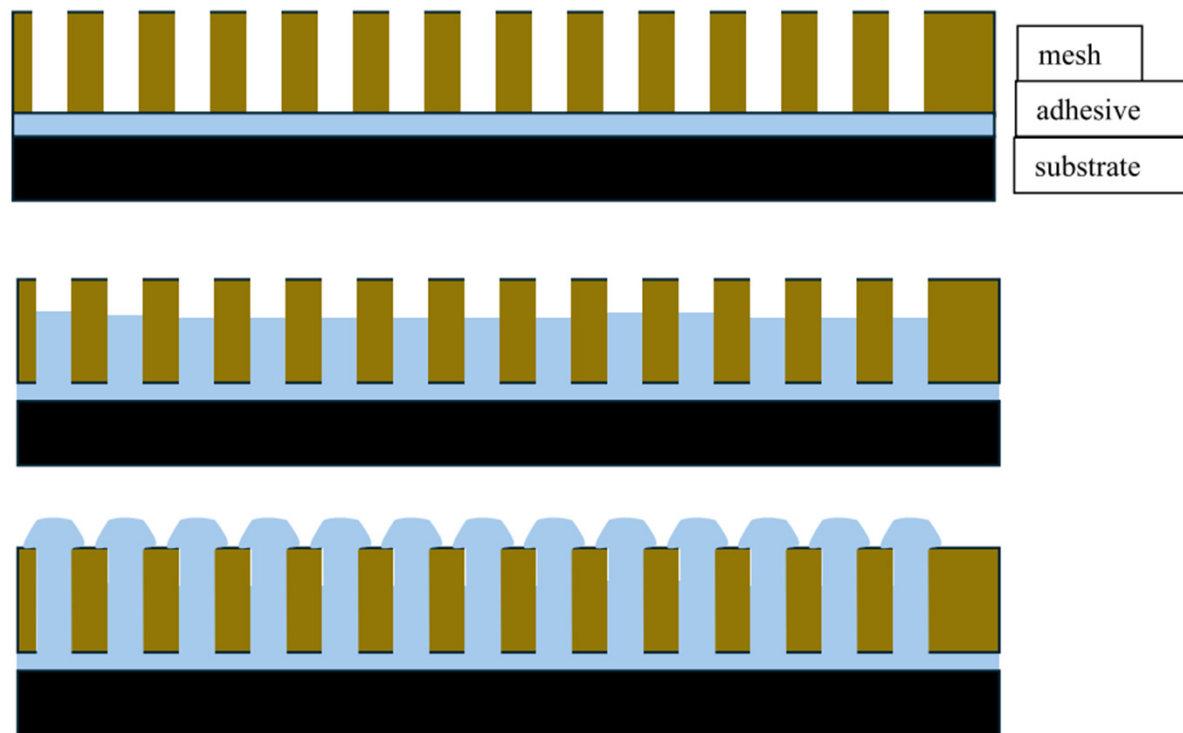
Q I see. It permeates through any openings in the fibers?

A Yes.

EX2029, Wang Deposition 84:4-9

No Motivation for a POSITA to Add a Mesh Layer to Phillips

- The adhesive becomes the friction bearing surface, not the mesh (EX2026, ¶200)



EX2026, Dr. Spiegelberg Declaration, ¶200

Secondary Considerations of Nonobviousness

- Patent Owner's success: rapid and sustained growth since 2022 (EX2033, ¶¶ 18-21, 24-26, 32-39)
- Patent Owner's expert: CoF testing of Patent Owner's products = nexus (EX2030, ¶50)
- *Power Integrations, Inc. v. Fairchild Semiconductor Int'l, Inc.*, 711 F.3d 1348, 1368 (Fed. Cir. 2013)
- Burden shifts to Petitioner (*Brown & Williamson Tobacco Corp. v. Philip Morris, Inc.*, 229 F.3d 1120, 1130 (Fed. Cir. 2000))
- Petitioner argues there are other reasons for success, but offers no analysis (Paper 27, 23-34)

PO's Experts Are More Skilled/Experienced In Fiber Science

- The '854 Patent describes the mesh layer in textile and fiber terms (Ex. 1001, 10:17–11:14, 12:65–13:8, 14:20–24)
- Petitioner's expert: a person with superior education in fiber science has:
 - a) greater depth of understanding of materials, chemical structure, and morphology (EX2029, 20:22-21:3; 25:24-28:22; 80:16-21)
 - b) additional training relating to fibers and their different applications (EX2029, 29:18-31:10)
 - c) specialized experience in microstructure of fibers (EX2029, 31:21-32:4)
 - d) better understanding how materials interact (EX2029, 33:17-34:21)

PO's Experts Are More Skilled/Experienced In Fiber Science

- Patent Owner's expert: Masters of Science in fiber science and a PhD in Fiber and Polymer Science (EX2027, Appendix A)
- Petitioner's expert: no Masters of Science in fiber science; no PhD in Fiber and Polymer Science (EX1003, Appendix A)

PO's Experts Are More Skilled/Experienced In CoF

- A POSITA has at least 5 years of CoF measurement/analysis experience (EX2026, ¶45; EX2030, ¶¶33-36)
- All experts: morphology of fabrics has a decisive effect on friction (EX2026, ¶45; EX2029, 67:23-68:9, 71:23-73:1, 109:21-110:19; EX1027)
- All experts: friction measurements are dependent on surface condition/chemistry (EX2026, ¶45; EX2029, 68:2-15; EX1027)
- A person lacking this experience will misunderstand/misuse CoF data (EX2026, ¶45)
- Patent Owner's expert: extensive experience in the study, testing, measurements, and analysis of CoF (EX2030, ¶37)
- Petitioner's expert: at best, much less experience (EX2029, 68:16-70:15)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on January 14, 2026, a complete and entire copy of Patent Owner's Demonstrative Exhibits was provided via email to the Petitioner by serving the email correspondence addresses of record as follows:

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