

PGR2025-00002
Patent No. 12,134,952

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLIGENT WELLHEAD SYSTEMS, INC.,
Petitioner,

v.

DOWNING WELLHEAD EQUIPMENT, LLC
Patent Owner

PGR2025-00002
Patent No. 12,134,952

**PETITIONER'S AMENDED MANDATORY NOTICES
PURSUANT TO 37 C.F.R. § 42.8**

PETITIONER’S AMENDED MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8, Petitioner, Intelligent Wellhead Systems, Inc. (“Petitioner”), submits the following amended mandatory notices in connection with the above-captioned post grant review proceeding concerning United States Patent No. 12,134,952 (“’952 Patent”).

REAL PARTIES IN INTEREST

Pursuant to 37 C.F.R. § 42.8(b)(1), Intelligent Wellhead Systems, Corp., IWS USA Corp., and Pason Systems Corp. are identified as real parties-in-interest.

RELATED MATTERS

Pursuant to 37 C.F.R. § 42.8(b)(2), as of the filing date of this notice, related matters include the following:

To the best of Petitioner’s knowledge, the ’952 Patent has not yet been involved in any legal proceeding; however, it is related to U.S. Patent No. 11,560,770 (“’770 Patent”/“’770”), and its parent, U.S. Patent No. 11,401,779 (“’779 Patent”/“’779”), which are involved in the following proceedings:

1. *Downing Wellhead Equipment, LLC v. Intelligent Wellhead Systems, Inc., et al.*, No. 1:23-cv-01180-RMR-SP (D. Colo.) (“the Litigation”) involving both the ’770 and ’779 Patents. Ex. 1011. On October 21, 2024, the district court administratively closed the Litigation pending the completion of IPR2024-00300,

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involving the '770 Patent. Ex. 1014.

2. *Intelligent Wellhead Systems, Inc. v. Downing Wellhead Equipment, LLC*, Case No. IPR2024-00256, before the Board, involving the '779 Patent. Institution was denied.

3. *Intelligent Wellhead Systems, Inc. v. Downing Wellhead Equipment, LLC*, Case No. IPR2024-00300, before the Board, involving the '770 Patent. The Board instituted trial on June 10, 2024. The Final Written Decision is due June 10, 2025.

4. *Intelligent Wellhead Systems, Inc. v. Downing Wellhead Equipment, LLC*, Case No. IPR2024-00583, involving the '779 Patent, institution denied.

5. *Intelligent Wellhead Systems, Inc. v. Downing Wellhead Equipment, LLC*, Case No. IPR2024-00584, involving the '770 Patent, institution denied.

LEAD AND BACK-UP COUNSEL

Pursuant to 37 C.F.R. § 42.8(b)(3), Petitioner designates the following Lead and Back-up Counsel:

Lead Counsel:	Backup Counsel:
Tammy J. Terry (Reg. No. 69,167) NELSON MULLINS RILEY & SCARBOROUGH LLP Heritage Plaza 1111 Bagby Street, Suite 2100 Houston, TX 77002 Tel.: 346.646.5389 Fax: 346.241.3758 Email: tammy.terry@nelsonmullins.com	Lisa E. Margonis (Reg. No. 57,123) NELSON MULLINS RILEY & SCARBOROUGH LLP Heritage Plaza 1111 Bagby Street, Suite 2100 Houston, TX 77002 Tel.: 346.646.5514 Email: lisa.margonis@nelsonmullins.com

SERVICE INFORMATION

Pursuant to 37 C.F.R. § 42.8(b)(4), Petitioner directs that papers concerning this matter should be served on Lead and Back-up counsel. Petitioner consents to service by email at tammy.terry@nelsonmullins.com.

PAYMENT OF FEES BY DEPOSIT ACCOUNT

The Patent Trial and Appeal Board is authorized to charge any fees payable by Petitioner associated with PGR2025-00002 to Deposit Account 50-1196.

Dated: February 6, 2025

Respectfully submitted,

/Tammy J. Terry/

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***Counsel for Petitioner Intelligent
Wellhead Systems, Inc.***

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that a true and correct copy of the foregoing Petitioner's Amended Mandatory Notices was served on February 6, 2025, via email to counsel for Patent Owner at the following:

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