

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIANCE, LLC,
Petitioner,
v.

KOPPERS PERFORMANCE CHEMICALS, INC.,
Patent Owner.

PGR2026-00023
Patent 12,370,716

**PETITIONER'S REPLY TO PATENT OWNER'S PRELIMINARY
RESPONSE**

No Written Description/Incorrect Legal Standard. PO's written description approach, whereby a POSA can ignore inconsistent disclosure and select and combine disparate portions of the specification (Ex1005, ¶¶31, 50) to derive the invention, is legally erroneous. *Novozymes A/S v. DuPont Nutrition Biosciences APS*, 723 F.3d 1336, 1349 (Fed. Cir. 2013) (improper to "[work] backward from a knowledge of [the claims], to derive written description support from an amalgam of disclosures plucked selectively from the[] application."). PO also fails to treat the claims as an "integrated whole," rather than a collection of limitations, as required for written description. *Id.*; *see also Ariad Pharm. Inc. v. Eli Lilly and Co.*, 598 F.3d 1336, 1356 (Fed. Cir. 2010) ("description which renders [invention] obvious not sufficient for written description requirement"); *Flash-Control, LLC v. Intel Corp.*, 2021 WL 2944592, at *4 (Fed. Cir. 2021) (improper to pick[] and choos[e] claim elements from different embodiments [not] linked together in the specification").

Working backward with knowledge of the claims, PO argues that weight ratios disclosed in the provisional provide written description support for the claimed 40-60 wt% range. Because the math is only possible with prior knowledge of the final composition, PO argues that the claims are supported by a "binary system—a system with exactly two components." (Br.12.) But, the claims are not limited to a binary system. (Ex1001, Claims 1, 26 ("A wood preservative composition *comprising*").) PO therefore fails to show written description support for the "*full scope*" of

the claims—which encompass non-binary, solvent-based systems. See *AbbVie Deutschland GmbH & Co., KG v. Janssen Biotech, Inc.*, 759 F.3d 1285, 1297-1301 (Fed. Cir. 2014). Nor is it sufficient to “cobbl[e] together numbers...to create an [un]stated range” and ignore contradictory statements in the specification. *Indivior UK Ltd. v. Dr. Reddy’s Laboratories S.A.*, 18 F.4th 1323, 1329 (Fed. Cir. 2021). PO’s own table shows that the 45-55/55-45 wt. % limitations cannot even be derived from the provisional. (Br.13.) *In re Wertheim*, 541 F.2d 257, 265 (C.C.P.A 1976) (Br.14) is inapposite, as it relied on “specific embodiments” to supplement a stated range.

PO’s asserted disclosure of a “binary” concentrate also fails because it presumes a multitude of selections: (1) inclusion of wax in the “retaining additive” which can be a polymer without a wax, (2) exclusion of an organic solvent (which is in the only example of a “concentrated formulation”) (Ex1005, ¶¶69-70), (3) exclusion of water/inorganic solvents, (4) exclusion of de-emulsifiers added to an organic-solvent-free composition (*Id.* at ¶49), (5) use of 1.5:1 to 1:1.5 weight ratio from other disclosed weight ratios, (6) exclusion of over 3 pages of desirable components suitable for an intermediate,¹ and (7) disregard of *inconsistent* statements that the composition can comprise “no greater than 10% by weight”

¹ PO’s support for a “two form,” “binary” concentrate does not exclude other components (e.g., any of 3 pages of other components, including water).

DCOI, and “no greater than 20% by weight” retaining additive. (*Id.* at ¶¶13, 30, 32.) Further, PO argues that 60/40 wt% is a 1:1.5 wt. ratio, but ignores that claims 1, 3-12, 14-25 recite a 1:5 to 5:1 wt. ratio. PO’s mix and match approach is a far cry from possession of the invention “as an integrated whole.”

Separately, PO incorrectly asserts that Petitioner’s approach to Rak “is the same elementary calculation.” (Br.14-15.) Petitioner never used a weight ratio to calculate a weight percent range, much less without knowledge of the total weight.

PO concedes the provisional is missing disclosure of the wax melting point ranges and microcrystalline wax but relies on prior art references to provide the missing limitations. Regarding claim 13, PO utterly fails to show the recited wax melting point ranges and end points align with the table of asserted “known physical properties.” (Br.21.) Regarding claims 8 and 26, “petroleum wax” does not provide support for microcrystalline wax (a specific fractional distillate), which has different physical properties than the specific waxes disclosed. (Ex1040, p.16.) While a POSA might be familiar with melting points or understand microcrystalline wax is a subgenus of petroleum waxes, a description that merely renders an invention obvious is not sufficient for the written description requirement.

PO’s lack of enablement argument for Rak (Br.71-73) applies with force here; there is no “order of addition,” “cooling parameters,” “stability data,” “testing,” etc.

BDES is Prior Art. PO argues that BDES is nonpublic because it “never gave

the general public access to UP-50.” (Br.39.) Rather, “[s]ecret sales by third parties, []where there is no disclosure of the claimed invention, can trigger §102(b)’s on-sale bar if the sold product embodies the claimed invention.” *Cisco System, Inc. v. Ramot At Tel Aviv University Ltd.*, 2025 WL 2986724, at *2–5 (D. Del. 2025) (surveying cases, rejecting public use reasoning) (citing *BASF Corp. v. SNF Holding Co.*, 955 F.3d 958, 968 n.7 (Fed. Cir. 2020) (“third party’s secret sale []created an on-sale bar [] an unremarkable proposition”)); *J.A. LaPorte, Inc. v. Norfolk Dredging Co.*, 787 F.2d 1577, 1583 (Fed. Cir. 1986) (“question is not whether the sale [] ‘discloses’ the invention”). PO’s public use cases (e.g., *Dey*, *W.L Gore*, *BASF*) are thus inapposite.

MDS is inapposite. *MDS Associates, Ltd. Partnership v. U.S.*, 37 Fed. Cl. 611, 633 (1997). Unlike BDES, all aspects of the transaction were secret (“classified”), the buyer was “prohibited” from “reselling” and had to employ an “equivalent classification system;” the public “would not have ‘justifiably [believed]’ the system was available. *Id.* *MDS* also fails to consider *LaPorte* and improperly analyzes on-sale as public use. Further, the law has “never required that a sale be consummated or an offer accepted” or distinguished sales from offers for sale. *Helsinn Healthcare S.A. v. Teva Pharmaceuticals USA, Inc.*, 855 F.3d 1356, 1370 (Fed. Cir. 2017). Delivery and regulatory approval are immaterial. *Id.* at 1365; *Laporte, supra* at 1583.

Failure to apply the on-sale bar here would result in withdrawal of the invention from the public domain. There was no obligation of confidentiality

restricting disclosure of the existence of the BDES agreement, which is limited to matters of a “proprietary nature.” (Ex1027, p.13.) *Triple Plus Ltd. v. Mordechai Ben Old*, PGR2018-00038, Paper 8 at 23 (PTAB Aug. 29, 2018). This fact ends the issue.

The *details* of BDES *also* demonstrate the public nature of the existence of this supply agreement, as both the supplier and buyer/user were to promote UP-50 to current and prospective customers. (Ex1027, §§3.a-4.e (“[Buyer] will []undertake the promotion of ...UP-50” and “the sale of...UP-50 treated poles to its existing customers and prospects” and train all sales/support personnel on the “features, benefits, and technical details” of UP-50 treatment. It will do so via “sales presentations” to industry representatives/conferences and via “promotional events,” company literature, and websites—to “influence []industry associations.” Supplier “shall” provide marketing/website materials and conduct “joint sales calls.” (§4.c).)

Grounds 7 & 8. PO’s arguments for Grounds 7 and 8 fail to apply the correct legal standard. The “particular motivation” of the patentee does not control the obviousness inquiry; “[w]hat matters is the objective reach of the claim.” *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 419-20 (2007); *ImmunoGen, Inc. v. Stewart*, 130 F.4th 1328, 1333 (Fed. Cir. 2025) (“motivation analysis is not limited by the problem or need recognized by the inventors.”). PO’s litany of arguments are legally erroneous because they fail to consider the objective reach of the claims.

No Teaching Away. PO argues that Rak teaches away from oil-based solvent

systems and that the '716 patent is directed to oil-based solvents that remain in the wood for "commercial pressure treatment." (Br.59-61.) But the independent claims do not even claim a "solvent," and dependent claims 11, 14, 15, 27 broadly encompass "organic," "hydrocarbon," and/or "halogenated" solvents, including the very solvents Rak discloses. (Ex1001, 3:36-41, 4:52-55, 4:63 (methylene chloride, perchloroethylene, toluene).) A WPA paper similarly discloses use of toluene solvent for DCOI "to achieve the desired retentions..." (Ex1028, p. 20). The claims also do not require commercial pressure treatment or that the solvent remain in the wood.

PO further argues that Rak "teaches that oil-based systems are 'unacceptable for commercial pressure treatment use.'" (Br.60.) In doing so, PO mischaracterizes Rak. The subject passage from Rak involves a specific formulation in a specific solvent (naphtha) for a specific application ("designed only for surface pore blocking and improved adhesion"), for which Rak states "this degree of penetration" would be "unacceptable for commercial pressure treatment" (Ex1015, 7:22-28.) The passage does not state that its invention is not useful for all oil-based compositions.

No Changed Principles of Operation/Inoperability. PO incorrectly argues that Rak "relies on volatile, low-boiling point solvents for deep penetration into the wood" for "pressure treatment." (Br.60-65.) Rak, however, *also* teaches "non-pressure treatments" such as "dip, brush, or spray treatments" for which such characteristics "*are not necessary criteria for solvent definition.*" (Ex1015, 3:36-42.)

See Exotec Prod. France SAS et al v. Opec Corp., IPR2024-00850, Paper 39 at 34-35 (PTAB Oct. 28, 2025) (no change in principle of operation, citing “several purposes for its invention”); *Winner Int’l Royalty Corp. v. Wang*, 202 F.3d 1340, 1349 n.8 (Fed. Cir. 2000) (“motivating benefit [may] come[] at the expense of another benefit[]”). Rak broadly teaches “high retention” for “organic preservatives,” e.g., non-“crystalline” (Br.17)—it does not tie all uses/benefits to solvent evaporation.

With respect to using diesel and biodiesel as a solvent, claim 16 depends from claim 14 which recites “diluting,” not “dissolving,” the composition of claim 1. PO’s inoperability argument that “diesel does not *dissolve* the [Rak] polymers is thus legally erroneous. (Br.65.) In any case, AWWA discloses diesel, biodiesel and blends for DCOI (Pet.20) which can dilute/dissolve polystyrene of Rak. (Ex1095.) Further, Rak’s statement, which follows a discussion of a particular solvent “polyvinyl formal,” that “aliphatic hydrocarbons e.g., Varsol (trademark) ... do not dissolve the polymers,” does not apply to all polymers and aliphatic hydrocarbons. Rak’s example 6 shows polystyrene dissolves in naphtha, an aliphatic hydrocarbon (Ex1015, 3:47-51.) Nor does Rak state that diesel or biodiesel will not work.

Other Errors. PO argues Rak is not enabled (Br.71) but ignores the lower enablement standard for prior art. PO argues “no track record” for DCOI (Br.56), but omits it was “approved” and 1 of only 2 EPA-identified oil-borne alternatives. (Ex1023, p.12.) Polyurethane is not “same class” as “vinyllic” Rak polymers. (Br.75.)

Dated: July 6, 2026

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PETITIONER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. 42.63(e), Petitioner hereby submits the following Petitioner's Updated Exhibit List with its Reply to Patent Owner's Preliminary Response:

No.	Reference	Referred to As
1001	U.S. Patent No. 12,370,716	'716 Patent
1002	Declaration of Dennis Morgan	Morgan Declaration
1003	Curriculum Vitae of Dennis Morgan	Morgan CV
1004	Certified File History of U.S. Patent No. 12,370,716	'716 Pat. Hist.
1005	U.S. Provisional Application No. 63/229,817, filed on August 5, 2021	'817 provisional application
1006	PCT/US2022/074619, filed on August 5, 2022	PCT '619 application
1007	PCT application no. WO2023/096905, filed on November 22, 2022, published on June 1, 2023	PCT '905 application or "Archer"
1008	PCT U.S. national stage Application No. US18/294,852 (U.S. national stage application of the PCT '619 application, filed on August 5, 2022.), published on October 17, 2024	'852 application
1009	U.S. Application No. US19/072,608, filed on March 6, 2025, which is a continuation of a PCT U.S. national stage application No. 18/294,852	'608 application

No.	Reference	Referred to As
1010	U.S. Provisional Application No. 63/282,794, filed on November 24, 2021	'794 provisional application
1011	Declaration of Kevin Archer	Archer Declaration
1012	UP-50 Internal Manufacturing Specification	UP-50 manufacturing document
1013	UP-50 Environmental Protection Agency ("EPA") Approval Letter	EPA Approval Letter
1014	UP-50 Wood Preservative Concentrate Product Label	UP-50 Label
1015	U.S. Patent No. 4,143,010, filed March 27, 1978, granted March 6, 1979	'010 patent or "Rak"
1016	U.S. Application No. 11/222,552, filed on September 9, 2005 and published as U.S. 2006/0057300, on March 16, 2006	'300 publication or "Cui"
1017	U.S. Application No. 11/408,425, filed on April 21, 2006 and published as US2006/0240263 on October 26, 2006	'263 publication or "Ashmore '263"
1018	Declaration of Barbara Aldinger	Aldinger Declaration
1019	U.S. Application No. 11/656,100, filed on January 22, 2007 and published as US2007/0175360 on August 2, 2007	'360 publication or "Ashmore '360"

No.	Reference	Referred to As
1020	U.S. Application No. 12/087,106, filed on January 29, 2007 and published as US 2009/0004497 on January 1, 2009	'497 publication or "Blow"
1021	U.S. Application No. 16/497,089, filed on March 29, 2018 and published as U.S. 2021/0112812 on April 22, 2021	'812 publication or "Arumugam"
1022	Letter filed to the Washington Department of Ecology dated January 16, 2020	Customer Letter
1023	EPA Pentachlorophenol Final Registration Review Decision, Case Number 2505, dated December 2021	EPA Final Decision
1024	UP-50 Solubility Report, Received December 1, 2025	UP-50 Solubility Report
1025	Proposed Modified Protective Order	Proposed Modified Protective Order
1026	Proposed Modified Protective Order showing redlines made to the Default Protective Order	Redline Proposed Modified Protective Order
1027	Business Development and Exclusive Supply Agreement dated February 5, 2021	BDES Agreement
1028	AWPA 114 th Annual meeting paper, copyright 2018	AWPA paper
1029	2019 AWPA Book of Standards, P39-18 Standard (p.139)	P39-18
1030	2019 AWPA Book of Standards, HSA-18 Standard (p.161)	HSA-18

No.	Reference	Referred to As
1031	Purchase order from Viance to toll manufacturer dated 04/19/2022 for first sale of UP-50	04/19/2022 Purchase Order from Viance to Toll Manufacturer
1032	Purchase order from customer to Viance dated 05/18/2022 for first sale of UP-50	05/18/2022 Customer Purchase Order
1033	Bill of Lading dated 05/27/2022 for first sale of UP-50	05/27/2022 Bill of Lading
1034	Invoice from Viance to customer dated 06/29/2022 for third sale of UP-50	06/29/2022 Invoice to Customer
1035	Sales Order Acknowledgement from toll manufacturer to Viance dated 06/29/2022 for third sale of UP-50	06/29/2022 Sales Order Acknowledgement
1036	Shipping invoice from shipping company to Viance dated 06/29/2022 for third sale of UP-50	06/29/2022 Shipping Invoice
1037	Bill of Lading dated 06/29/2022 for third sale of UP-50	06/29/2022 Bill of Lading
1038	Invoice from Viance to customer dated 07/07/2022 for third sale of UP-50	07/07/2022 Invoice to Customer
1039	Corrected Invoice from Viance to customer dated 07/07/2022 for third sale of UP-50	07/07/2022 Corrected Invoice to Customer
1040	Fuels and Lubricants Handbook: Technology, Properties, Performance, and Testing; Ch. 19 "Petroleum Waxes", Mansoori, et al.	Petroleum Waxes
1041	Fischer-Tropsch Wax Safety Data Sheet	F-T SDS
1042	Microcrystalline Wax Safety Data Sheet	Microcrystalline SDS
1043	Diesel Fuel SDS	Diesel SDS

No.	Reference	Referred to As
1044	Biodiesel SDS	Biodiesel SDS
1045	Invoice from toll manufacturer to Viance dated 05/20/2022 for first sale of UP-50	05/20/2022 Toll Manufacturer Invoice
1046	Purchase order from Customer to Viance dated 05/20/2022 for second sale of UP-50	05/20/2022 Customer Purchase Order
1047	Invoice from toll manufacturer to Viance dated 06/24/2022 for second sale of UP-50	06/24/2022 Toll Manufacturer Invoice
1048	Invoice from shipping company to Viance dated 07/06/2022 for second sale of UP-50	07/06/2022 Shipping Invoice
1049	Bill of lading dated 06/24/2022 for second sale of UP-50	06/24/2022 Bill of Lading
1050	Sales order dated 06/20/2022 for third sale of UP-50	06/20/2022 Customer Order
1051	Invoice from toll manufacturer to Viance dated 06/29/2022 for third sale of UP-50	06/29/2022 Toll Manufacturer Invoice
1052	Email with customer order dated 07/26/2022 for fourth sale of UP-50	07/26/2022 Order Email from Customer
1053	Sales order dated 07/26/2022 for fourth sale of UP-50	07/26/2022 Customer Order
1054	Invoice from toll manufacturer to Viance dated 08/05/2022 for fourth sale of UP-50	08/05/2022 Toll Manufacturer Invoice
1055	Bill of Lading dated 08/05/2022 for fourth sale of UP-50	08/05/2022 Bill of Lading
1056	Invoice from shipping company to Viance dated 08/24/2022 for fourth sale of UP-50	08/24/2022 Shipping Invoice
1057	Purchase order from Viance to toll manufacturer dated 05/12/2022 for second sale of UP-50	05/12/2022 Invoice from Viance to Toll Manufacturer

No.	Reference	Referred to As
1058	Email with customer order dated 06/17/2022 for third sale of UP-50	06/17/2022 Order Email from Customer
1059	Invoice from Viance to customer dated 05/27/2022 for first sale of UP-50	05/27/2022 Invoice to Customer
1060	Invoice from Viance to customer dated 06/24/2022 for second sale of UP-50	06/24/2022 Invoice to Customer
1061	Invoice from Viance to customer dated 08/05/2022 for fourth sale of UP-50	08/05/2022 Invoice to Customer
1062	Invoice from shipping company to Viance dated 06/08/2022 for first sale of UP-50	06/08/2022 Shipping Invoice
1063	Correlation Between the Composition and Flash Point of Diesel-Biodiesel Blends	de Mattos
1064	HCS 25 Treating Oil SDS, Prepared January 3, 2014; Revised on January 15, 2015	HCS 25 Treating Oil SDS
1065	Invoice for HCS 25 Treating Oil Dated January 10, 2014	01/10/2014 Invoice for HCS 25 Treating Oil
1066	Invoice for HCS 25 Treating Oil Dated April 28, 2014	04/28/2014 Invoice for HCS 25 Treating Oil
1067	Gardner's Commercially Important Chemicals Synonyms, Trade Names and Properties	Gardner's Commercially Important Chemicals
1068	Paraffin solubility curves of diesel fuels from thermodynamic model adjusted through experimental DSC thermograms, Fuel, Carmo, Rafael et al. (2018)	Paraffin Solubility Curves of Diesel Fuel
1069	Wood Treatment Plant Had a Clean Operating Record, Nevada Appeal, January 31, 2002	Wood Treatment Plant Fire Article

No.	Reference	Referred to As
1070	Evaluation report titled “DCOI Treatment Analysis – UP50 Treatment 1, 2, 3 and 4” and dated December 3, 2020	12/03/2020 UP-50 Report
1071	Evaluation report titled “DCOI - UP50” and dated January 7, 2021	01/07/2021 UP-50 Report
1072	Evaluation report titled “DCOI Summary Report” dated April 15, 2021	04/15/2021 UP-50 Report
1073	Presentation titled “DCOI Treatments Summary” dated May 2, 2021	05/02/2021 Presentation
1074	Presentation titled “Quick DCOI Summary” dated December 23, 2020	12/23/2020 Presentation
1075	Cover letter submitted to the Environmental Protection Agency for registration of UP-50 and proposed label, dated February 28, 2021	EPA Proposed Label
1076	Presentation summarizing evaluations of UP-50 dated September 28, 2020	09/28/2020 Presentation
1077	Document summarizing evaluations of UP-50 dated September 28, 2020	09/28/2020 UP-50 Report
1078	Environmentally friendly properties of vegetable oil methyl esters	Gateau
1079	Business Development and Exclusive Supply Agreement dated October 16, 2018 with amendments	10/16/2018 Agreement with Amendments
1080	UP-23 Wood Preservative Concentrate Product Label	UP-23 Label
1081	July 15, 2022 and July 26, 2022 emails reporting transition to UP-50	Emails regarding transition to UP-50
1082	June 10, 2022 timeline for transitioning to UP-50	06/10/2022 UP-50 transition timeline report
1083	Records of UP-50 treatments conducted from June 29, 2022 to July 2, 2022	06/29/2022-07/02/2022 Treatment Records

No.	Reference	Referred to As
1084	July 29, 2022 Invoice from Viance's Customer to Third-Party	06/29/2022 First Invoice from Viance's Customer to Third-Party
1085	July 29, 2022 Invoice from Viance's Customer to Third-Party	06/29/2022 Second Invoice from Viance's Customer to Third-Party
1086	Records of UP-50 treatments conducted from June 19, 2022 to August 4, 2022	06/19/2022-08/04/2022 Treatment Records
1087	Declaration by Viance's Customer	Customer Declaration
1088	Amended and Restated Limited Liability Company Agreement, dated January 2, 2007	LLC Agreement
1089	Customer Toll Manufacturing Agreement executed December 2021	Customer Tolling Agreement
1090	Second Customer Toll Manufacturing Agreement executed September 2023	Second Customer Tolling Agreement
1091	Declaration of Jonathan Moyes	Moyes Decl.
1092	12/09/2025 Letter from Koppers Performance Chemicals to Viance LLC	12/09/20025 Letter
1093	Subsidiary vs. Affiliate: Key Differences Explained, The Investopedia Team, available at https://www.investopedia.com/ask/answers/06/subsidiaries.asp	Subsidiary v. Affiliate Article
1094	Declaration of John Husa	Husa Decl.
1095	Performance and emissions of a diesel engine fueled by biodiesel-diesel blends with recycled expanded polystyrene and fuel stabilizing additive, Calder, Jorge et al (April 15, 2018)	Calder et al.

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petitioner's Reply to Patent Owner's Preliminary Response complies with the 7-page limit set forth by the Board in its email correspondence authorizing Petitioner to file this Reply to Patent Owner's Preliminary Response. (*See* Ex3101.) This page count does not include the items excluded by 37 C.F.R. § 42.24 as not counting towards the page limit.

Date: July 6, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that the foregoing Petitioner's Reply to Patent Owner's Preliminary Response was served on July 6, 2026, via Electronic Mail on the Patent Owner's lead and backup counsel at the following addresses of record:

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