

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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META PLATFORMS, INC.,  
Petitioner,

v.

MULLEN INDUSTRIES LLC,  
Patent Owner.

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Case No. IPR2025-00745  
U.S. Patent No. 9,662,582

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**PATENT OWNER MULLEN INDUSTRIES LLC'S  
MOTION TO DISMISS**

Mullen Industries LLC hereby moves to dismiss the captioned IPR on the grounds that Mullen has disclaimed all claims at issue in this IPR, namely, Claims 1, 2, 11 and 13 of the '582 patent. This disclaimer is attached as Exhibit A. Because all claims at issue have been disclaimed, any case or controversy over the claims is moot. *Sanofi-Aventis U.S., LLC v. Dr. Reddy's Lab'ys, Inc.*, 933 F.3d 1367, 1373 (Fed. Cir. 2019) (holding that “disclaimer of the disclaimed claims mooted any controversy over them”). Accordingly, the IPR should be dismissed.

Dated: October 30, 2025

Respectfully submitted,

*/s/Peter F. Snell*

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**CERTIFICATE OF SERVICE**

I certify that a copy of this Patent Owner's Motion to Dismiss is being served  
by electronic mail on the following counsel of record:

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Dated: October 30, 2025

*/s/Peter F. Snell*

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Peter F. Snell (Reg. No. 52,235)

# **EXHIBIT A**

<b>DISCLAIMER IN A PATENT UNDER 37 CFR 1.321(a)</b>	
Name of Patentee <b>Mullen Industries LLC</b>	Docket Number (optional) <b>060702-004</b>
Patent Number <b>9,662,582</b>	Date Patent Issued <b>May 30, 2017</b>
Title of Invention Systems and methods for location based games and employment of the same on location enabled devices	
Patentee hereby disclaims: <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> the following complete claim(s) in the above-identified patent: <u>1, 2, 11 and 13</u>.</li> <li><input type="checkbox"/> the terminal part of the term of the above-identified patent beginning on the date: _____.</li> <li><input type="checkbox"/> the entire term of the above-identified patent.</li> </ul> The disclaimer is binding on the patentee and its successors or assigns. The extent of patentee's ownership interest in the above-identified patent is: <u>100%</u> . The fee for this disclaimer is set forth in 37 CFR 1.20(d) and is being paid in the following manner: <ul style="list-style-type: none"> <li><input type="checkbox"/> payment by the USPTO patent electronic filing system.</li> <li><input checked="" type="checkbox"/> the Director is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No. <u>50-0311</u>.</li> <li><input type="checkbox"/> payment by credit card. Form PTO-2038 is attached.</li> <li><input type="checkbox"/> a check in the amount of the fee is enclosed.</li> </ul> WARNING: Information on this form may become public. Credit card information should not be included on this form. Provide credit card information and authorization on form PTO-2038. The undersigned is: <ul style="list-style-type: none"> <li><input type="checkbox"/> patentee. If patentee is a juristic entity, the undersigned is authorized to act on behalf of the juristic entity.</li> <li><input checked="" type="checkbox"/> attorney or agent of record.</li> </ul>	
Signature <b>/Peter F. Snell/</b>	Date <b>October 30, 2025</b>
Name (printed/typed) <b>Peter F. Snell</b>	Practitioner registration number <b>52,235</b>
<b>Note:</b> See 37 CFR 1.4(d) for signature requirements and certifications.	

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If you do not furnish the information requested on this form, the USPTO may not be able to process and/or examine your submission, which may result in termination of proceedings, abandonment of the application, and/or expiration of the patent.



UNITED STATES  
PATENT AND TRADEMARK OFFICE

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## ELECTRONIC ACKNOWLEDGEMENT RECEIPT

APPLICATION # <b>11/842,019</b>	RECEIPT DATE / TIME <b>10/30/2025 06:25:37 PM Z ET</b>	ATTORNEY DOCKET # <b>JDM/005 CON7</b>
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### Title of Invention

SYSTEMS AND METHODS FOR LOCATION BASED GAMES AND EMPLOYMENT OF THE SAME ON LOCATION ENABLED DEVICES

### Application Information

APPLICATION TYPE	Utility - Nonprovisional Application under 35 USC 111(a)	PATENT #	9662582
CONFIRMATION #	2744	FILED BY	Peter Snell
PATENT CENTER #	72980968	FILING DATE	08/20/2007
CUSTOMER #	32733	FIRST NAMED INVENTOR	Jeffrey D. Mullen
CORRESPONDENCE ADDRESS	-	AUTHORIZED BY	-

### Documents

**TOTAL DOCUMENTS: 1**

DOCUMENT	PAGES	DESCRIPTION	SIZE (KB)
582 Patent - Disclaimer.pdf	2	Statutory disclaimers per Manual of Patent Examining Procedure(MPEP) 1490.	114 KB

### Digest

DOCUMENT	MESSAGE DIGEST(SHA-512)
582 Patent - Disclaimer.pdf	1B335C9AFE5236013278776615650C579C10348F23AFF94BC242214AE17264BD5A3FFCAA0D60EDEAAF4B4D7F92311585F3A0F003D186048F9ACAE75E03F88D9C

This Acknowledgement Receipt evidences receipt on the noted date by the USPTO of the indicated documents, characterized by the applicant, and including page counts, where applicable. It serves as evidence of receipt similar to a Post Card, as

described in MPEP 503.

**New Applications Under 35 U.S.C. 111**

If a new application is being filed and the application includes the necessary components for filing date (see 37 CFR 1.53(b)-(d) and MPEP 506), a Filing Receipt (37 CFR 1.54) will be issued in due course and the date shown on this Acknowledgement Receipt will establish the filing date of the application

**National Stage of an International Application under 35 U.S.C. 371**

If a timely submission to enter the national stage of an international application is compliant with the conditions of 35 U.S.C. 371 and other applicable requirements a Form PCT/DO/EO/903 indicating acceptance of the application as a national stage submission under 35 U.S.C. 371 will be issued in addition to the Filing Receipt, in due course.

**New International Application Filed with the USPTO as a Receiving Office**

If a new international application is being filed and the international application includes the necessary components for an international filing date (see PCT Article 11 and MPEP 1810), a Notification of the International Application Number and of the International Filing Date (Form PCT/RO/105) will be issued in due course, subject to prescriptions concerning national security, and the date shown on this Acknowledgement Receipt will establish the international filing date of the application.



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## ELECTRONIC PAYMENT RECEIPT

APPLICATION # <b>11/842,019</b>	RECEIPT DATE / TIME <b>10/30/2025 06:25:37 PM Z ET</b>	ATTORNEY DOCKET # <b>JDM/005 CON7</b>
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PATENT CENTER #	72980968	AUTHORIZED BY	-
CUSTOMER #	32733	FILING DATE	08/20/2007
CORRESPONDENCE ADDRESS	-	FIRST NAMED INVENTOR	Jeffrey D. Mullen

### Payment Information

PAYMENT METHOD DA / 500311	PAYMENT TRANSACTION ID E20250TI25519018	PAYMENT AUTHORIZED BY Peter Snell
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FEE CODE	DESCRIPTION	ITEM PRICE(\$)	QUANTITY	ITEM TOTAL(\$)
1814	STATUTORY DISCLAIMER, INCLUDING TERMINAL DISCLAIMER	183.00	1	183.00
			<b>TOTAL AMOUNT:</b>	<b>\$183.00</b>

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