

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ALLIANCE LAUNDRY SYSTEMS, LLC,  
Petitioner,

v.

PAYRANGE LLC,  
Patent Owner.

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Case No. IPR2025-00950  
Patent No. 10,891,608

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**PATENT OWNER'S REPLY BRIEF  
IN SUPPORT OF DISCRETIONARY DENIAL**

Pursuant to email authorization (EX3101), Patent Owner PayRange LLC submits this reply brief to address Petitioner’s arguments that the prior unsuccessful PGR and IPR challenges to the ’608 patent do not warrant discretionary denial. *See* Paper 7 (Opp.), 8-22. Petitioner’s petition raises the same concerns of roadmapping that the Director recently stated weigh in favor of discretionary denial in *Amazon Web Services, Inc. v. Croga Innovations, Ltd.*, IPR2025-00884, Paper 9 (Sept. 3, 2025). These concerns are not outweighed by Petitioner’s “efficiency considerations” related to other PayRange patents challenged by Petitioner, especially in further view of Petitioner’s reliance on its expert’s “expertise” to supply missing claim limitations.

The ’608 patent claims have been adjudicated twice before the Board: once in a PGR brought by Kiosoft, and a second time in a IPR brought by CSC. *See* Paper 6 (Req.), 1, 5-6. The Board in both cases evaluated the art applied and concluded it insufficient to warrant trial. *Id.* In its opposition, Petitioner admits it “relies on the same reference, Breitenbach, as a primary reference for both of its grounds of invalidity” that was used by Kiosoft in its PGR challenge. Opp., 4. Petitioner distinguishes itself from the Kiosoft PGR by arguing that “*the present Petition addresses and cures any purported deficiencies* with Breitenbach by relying on additional references Brown and Kaspar”—relying on Brown in an attempt to fill in the limitation that the Board identified as missing from

Breitenbach in the previous PGR. Opp., 4-5, 36 (emphasis added); *see also id.*, 6-7 (Petitioner arguing its petition also demonstrates how Breitenbach and Brown teach limitations found missing in the references applied by CSC), 13-14 (arguing “Petitioner does not rely on Breitenbach to teach the relevant limitation” as Kiosoft did (emphasis omitted)).

This represents a clear-cut case of roadmapping, as confirmed by the Director’s decision in *Amazon Web*. There, the Director found relevant that Amazon Web’s petition represented “the fourth petition for *inter partes* review involving the challenged patent,” where two prior petitions, brought by petitioners Fortinet and Cisco, were denied institution on the merits. *Amazon Web*, Paper 9, 2. The prior petitions relied on the reference Delco for its disclosure of a claimed internal firewall limitation, which the Board determined was not taught by the reference. *See Amazon Web*, Paper 8, 12. As the Director noted, Amazon Web distinguished its petition from these prior challenges by arguing that its combination of references “***addresses the precise deficiency identified by the Board*** in denying the earlier petitions.” *Id.*, Paper 9, 2 (quoting Paper 8, 13) (emphasis added). The Director found that this “raises concerns of roadmapping and weighs in favor of discretionary denial.” *Id.*

Petitioner’s petition raises the same concerns. Opp., 36. Like in *Amazon Web*, the two failed post-grant challenges against the ’608 patent were brought by

different petitioners. Req., 5-6. Also like in *Amazon Web*, Petitioner here purports to apply art in a way expressly designed to “address[] and cure[]” deficiencies identified by the Board. Opp., 36; *see also id.*, 4-5, 6-7, 13-14. Petitioner’s arguments thus concede to using the prior Board decisions as a roadmap for its petition, which as in *Amazon Web* weighs in favor of discretionary denial.

These roadmapping concerns are not outweighed by Petitioner’s assertions of “efficiency considerations” allegedly raised by the Director’s referral of three petitions challenging other PayRange-owned patents to the merits panel. Opp., 17-19. While the ’608 patent claims priority to the same priority application (*id.*, 18), it is a CIP with claims that encompass different subject matter. EX1001, claim 1 (“[a] payment module for an offline payment-operated machine including a coin receiving switch”); PGR2025-00027, Paper 1, 14-15 (“[a] method of presenting representations of payment accepting unit events”). The referred petitions also apply different prior art in their obviousness challenges. *E.g.*, PGR2025-00027, Paper 1, 6 (applying Low, Arora, Freeny, and Casey).

Petitioner’s gap-filling further adds to the roadmapping concerns. Petitioner concedes that it relies on its expert’s “expertise” to explain how Breitenbach’s “‘coin-in’ signal” meets the precise electrical pulses expressly recited in the challenged claims (Opp., 6), despite Breitenbach providing no detail on the make-up of its signal (*see* Req., 9-10; POPR, 6-12).

Date: September 10, 2025

Respectfully submitted,

/ Matthew A. Argenti /  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing Patent Owner’s Reply Brief In Support of Discretionary Denial was served on September 10, 2025, on the Petitioner at the electronic correspondence address of the Petitioner as follows:

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Dated: September 10, 2025

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