

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BE SMARTER, LLC AND JAMES GUERRA

Petitioners

v.

YONDR, INC.

Patent Owner

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Case IPR2025-00970  
U.S. Patent No. 9,819,788 B2  
Issue Date: November 14, 2017

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**PETITIONERS' RESPONSE TO  
PATENT OWNER'S BRIEF IN SUPPORT  
OF DISCRETIONARY DENIAL UNDER 35 U.S.C. § 314(a)**

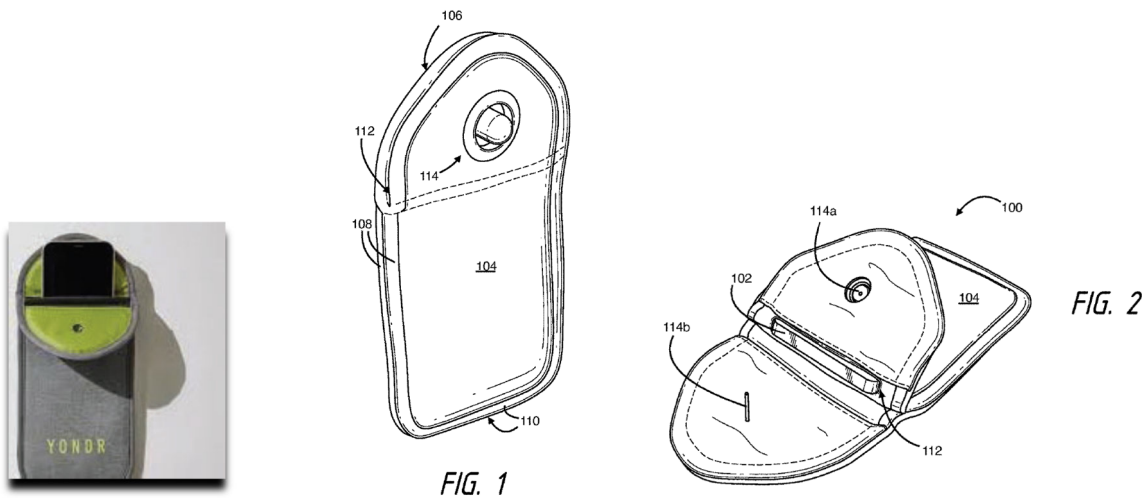
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### PETITIONERS' EXHIBIT LIST

<b>Exhibit No.</b>	<b>Description of Document</b>
<b>1017</b>	Petition for Post-Grant Review of U.S. Patent No. 12,133,078 (PGR2025-0070) (filed July 29, 2025)
<b>1018</b>	<i>Yondr, Inc. v. Be Smarter, LLC and James Guerra</i> , Case No. 1:24-cv-01326, Dkt. 54 (Scheduling Order) (entered August 7, 2025)
<b>1019</b>	<i>Yondr, Inc. v. Be Smarter, LLC and James Guerra</i> , Case No. 1:24-cv-01326, Dkt. 51 (Joint Motion for Entry of a Scheduling Order) (filed August 4, 2025)
<b>1020</b>	Lex Machina Timing Statistics for Federal District Court Cases before Judge Alan D Albright
<b>1021</b>	<i>Yondr, Inc. v. Be Smarter, LLC and James Guerra</i> , Case No. 1:24-cv-01326, Dkt. 56 (Defendants' Motion to Stay)(filed August 25, 2025)
<b>1022</b>	Lex Machina Stay Statistics Regarding <i>Inter Partes</i> Review for Federal District Court Cases before Judge Alan D Albright
<b>1023</b>	<i>Yondr, Inc. v. Win Elements, LLC</i> , Case No. 5:21-cv-2105-WLH-kk (C.D. Cal.), Dkt. No. 15 (Amended Complaint) (filed March 8, 2022)
<b>1024</b>	<i>Yondr, Inc. v. Win Elements, LLC</i> , Case No. 5:21-cv-2105-WLH-kk (C.D. Cal.), Dkt. No. 96 (Stipulation) (filed July 5, 2023)
<b>1025</b>	<i>Win Elements LLC v. Yondr, Inc.</i> , Case No. 2:24-cv-09311-JLS-E (C.D. Cal.), Dkt. No. 72
<b>1026</b>	Notice of Institution Regarding Cancellation Proceeding No. 92089335 and Petition to Cancel Registration No. 6995045 (filed August 27, 2025).

Patent Owner Yondr seeks discretionary denial of Be Smarter's Petition for *Inter-Partes* Review of U.S. Patent No. 9,819,788 B2 ("Petition"), consistent with its prior efforts to avoid review of this patent and its progeny. Both parties sell locking pouches to schools trying to avoid distractions by limiting students' cell phone use in the classroom. Based on a fundamental examiner error, as well as prior art never considered by the examiner, Yondr obtained and continues to seek patents covering this simple locking pouch.



(EX-1001, Figs. 1–2.)

Yondr has a history of attempting to intimidate the competition and even impliedly threatens to sue school districts for infringement of these patents. At the same time, however, Yondr has dismissed its prior cases before any court could adjudicate the examiner error or evaluate the rest of the prior art, leaving Yondr free to continue to monopolize this market (a market ultimately funded by parents and

taxpayers). In addition, Yondr still has a continuation application (U.S. Patent Application No. 18/898,900) pending and is actively pursuing an additional patent arising from the same seminal error.

Be Smarter is a startup company that has responded to Yondr's aggression in the most economical way possible, by seeking review of Yondr's patents by this Board. To that end, Be Smarter filed this IPR, as well as a PGR against Yondr's newly-issued U.S. Patent No. 12,133,078 ("the '078 patent"). (*See generally* EX-1017 (PGR2025-0070 Petition).) In the meantime, Yondr's parallel district court case is moving more slowly and, of course, would be very expensive and burdensome for a small company like Be Smarter. As explained below, trial is not likely until after Final Written Decisions issue on both Be Smarter's IPR and PGR and, if Yondr follows past practice, it will try to spend Be Smarter into bankruptcy but, in the end, seek to avoid any such trial, leaving these and future patents in place for use against the next competitor to come along.

### *Facts*

#### **I. The Parallel District Court Proceedings.**

While, Patent Owner Yondr filed its underlying lawsuit in October 2024, the district court did not enter a case schedule in that case until August 7, 2025. (EX-1018 (Case No. 1:24-cv-01326, Dkt. 54 (Scheduling Order).) This nine-month delay is the result of (i) Yondr waiting until February 2025 to propose a Rule 26(f)

scheduling conference; (ii) Yondr never filing a Case Readiness Status Report contrary to the district court's Order Governing Proceedings (OGP) in patent cases; and (iii) Yondr never filing a proposed case schedule with the court until August 4, 2025. (EX-1019, Case No. 1:24-cv-01326, Dkt. 51 (Joint Motion for Entry of a Scheduling Order).)

Moreover, the parties have not conducted any discovery. The only progress in the district court has been exchanging preliminary infringement and invalidity contentions and briefing claim construction. (EX-1018, at 2–3.) Just two weeks ago, the district court set a claim construction hearing for September 22, 2025. (EX-1018, at 4.)

Under the district court's OGP, trial is contemplated in September 2026, but the actual data for this court tells a different story. (*See* EX-1018, at 6 (tentatively setting jury selection/trial for September 2026).) According to publicly available federal court data, the district court's median time from claim construction to trial in this court is 531 days. (EX-1020.) Therefore, with a claim construction hearing set for September 22, 2025, trial is not likely until 2027.

In the meantime, Petitioner Be Smarter also has moved to stay the district court case in light of both this IPR and a Petition for Post Grant Review challenging the '078 Patent, the second patent-in-suit. (EX-1021.) Patent Owner argues the district court "routinely" denies motions to stay but, again, the data suggests

otherwise. The district court has granted at least 22 stays pending Patent Office challenges. (EX-1022 (showing the grant of a stay in 44% (22 out of 50 cases)).)

In addition, Be Smarter has stipulated both in this IPR and in the district court that it will not raise the same grounds, or any grounds that could have reasonably been raised in the IPR, in the district court. (EX-1021, at 4.) Defendants further stipulated in the district court that they will not raise *any* invalidity defenses under 35 U.S.C. §§ 102 or 103 if both Patent Office proceedings are instituted and the stay is granted. (EX-1021, at 4.)

## **II. Be Smarter's Petitions**

Be Smarter has challenged the validity of both patents asserted in the district court in petitions to the Patent Trial and Appeal Board. In addition to this IPR, on July 29, 2025, Be Smarter filed a Petition for Post-Grant Review challenging recently issued United States Patent No. 12,133,078. (EX-1017 (PGR2025-0070 Petition).)<sup>1</sup>

Under 35 U.S.C. § 316(a)(11), a Final Written Decision on this IPR is expected by December 2026. And a Final Written Decision on the PGR is expected in January 2027.

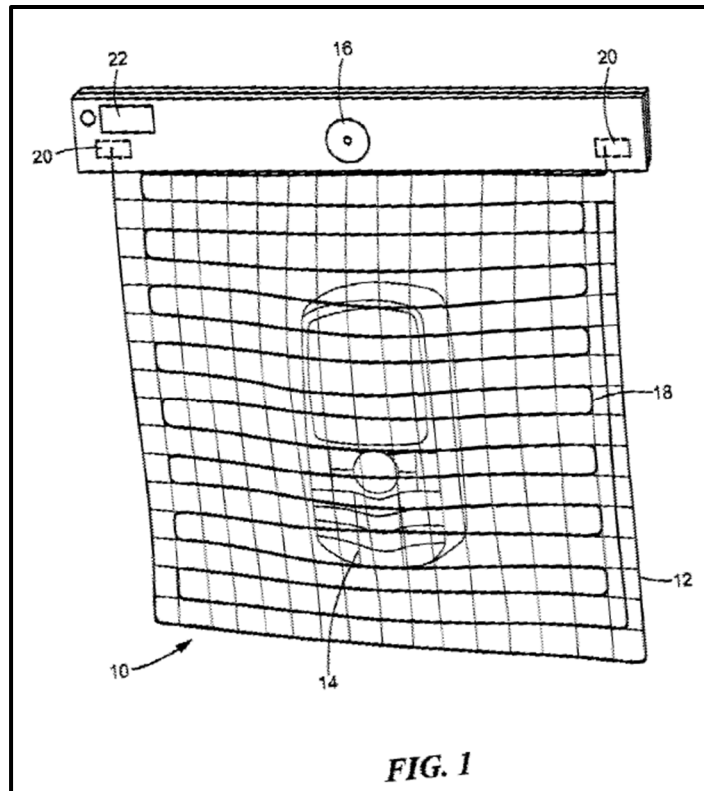
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<sup>1</sup> Be Smarter also filed a Petition to Cancel Yondr's asserted Trademark Registration No. 6,995,045 in the Trademark Office on August 27, 2025, based on Yondr's failure to disclose its patent and patent applications covering the same product design. (EX-1026.)

Finally, Yondr's patent application that led to the two asserted and challenged patents is still alive. (*See* Paper 9, Patent Owner's Corrected Mandatory Notices, at 1 (listing patents and patent applications that claim priority to application that led to the '788 patent).) That is, Yondr is seeking additional patents stemming from the same fundamental error giving rise to the asserted patents and this IPR.

### **III. The Examiner's Error in Prosecution of the '788 Patent**

The Examiner erred in the grant of the claims of the '788 patent. (*See* Petition, § V.D.) The Examiner originally and correctly rejected the Applicant's claims over Stewart (EX-1007)—and Stewart combined with other references—multiple times. Specifically, in an October 3, 2016, office action, the Examiner rejected pending claims under § 102 and § 103 over Stewart (EX-1007) and Stewart in combination with Campbell (EX-1010), Coleman (EX-1011), Furuta (EX-1012), Pellaton (EX-1013), or Ahya (EX-1014). (EX-1004-048–060 (October 3, 2016 Office Action at 4–16); EX-1002 (Buckner Decl.), ¶¶ 71–77 (discussing the first office action).) The Examiner specifically relied on Stewart's teaching of a case for securing a mobile electronic device until a predetermined condition is met including as shown in Figure 1:



(EX-1004-048–049 (October 3, 2016 Office Action at 4–5); *see also* EX-1002 (Buckner Decl.), ¶¶ 111–115 (providing an overview of Stewart’s teachings).)

The Applicant responded on March 3, 2017, by amending the claims and arguing first that Stewart did not teach “limiting a user’s access to his own property.” (EX-1004-073 (March 3, 2017 Response at 6); EX-1002 (Buckner Decl.), ¶ 78.) Second, the Applicant argued the Examiner failed to establish a *prima facie* showing of obviousness regarding the Stewart combinations by failing to establish a teaching, motivation, or suggestion to combine the prior art. (EX-1004-074–076 (March 3, 2017 Response at 7–9).) The Applicant did not otherwise address Stewart or the teachings of the other cited prior art.

In a May 5, 2017 Office Action, the Examiner rejected pending claims 1–7, 10, and 12–17 over Stewart and Stewart combinations, but indicated that pending claims 8, 9, and 11 would be allowable if rewritten as independent claims. (EX-1004-100 (May 5, 2017 Office Action at 17).) However, pending claims 8, 9, and 11 (which ultimately became issued claims 1–3) contained the same limitations as other claims the Examiner already had rejected over Stewart and Stewart combinations, so pending claims 8, 9, and 11 should have been rejected for the same reasons. (*See* EX-1004-029–030 (original claims filed April 21, 2015 at 22–23).) As correctly summarized by the Examiner with respect to pending claims 1–7, 10, and 12–17, “Applicants are just copying United States Patent Application 2012/0187003 [Stewart] and using it for another intended use.” (EX-1004-106 (May 5, 2017 Office Action at 23).) That rationale also should have been applied to pending claims 8, 9, and 11. (*See* Buckner Decl., ¶¶ 79–82 (discussing the application of Stewart to the claims).)

Pending claim 8 depended from rejected claim 7 and added the limitation “wherein the predetermined condition is physical presence outside of a defined geographic region.” (EX-1004-029 (April 21, 2015 Claims at 22).) That limitation also appeared in claim 5, which had been rejected over Stewart and Furuta (EX-1012). (EX-1004-029 (April 21, 2015 Claims at 22); EX-1004-055 (October 3, 2016 Office Action at 11); EX-1004-095 (May 5, 2017 Final Rejection at 12).) Pending

claim 9 also depended from rejected claim 7 and added the limitation “wherein the predetermined condition is the passage of time,” which was the same limitation rejected in pending claim 6 over Stewart and Pellaton (EX-1013). (EX-1004-029 (April 21, 2015 Claims at 22); EX-1004-057 (October 3, 2016 Office Action at 13); EX1004-097 (May 5, 2017 Final Rejection at 14).) Similarly, pending claim 11 depended from rejected claim 10, and added limitations regarding the front and rear panels and a locking means that also were described in pending claim 1, which already had been rejected over Stewart. (EX-1004-028, -030 (April 21, 2015 Claims at 21, 23); EX-1004-048–049 (October 3, 2016 Office Action at 4–5); EX-1004-088–089 (May 5, 2017 Final Rejection at 5–6).) This time, however, rather than reject those claims, which would have been consistent with the Examiner’s application of Stewart and the Stewart combinations to the other claims, the Examiner erroneously indicated claims 8, 9, and 11 were allowable if re-written to independent form. (EX-1004–099 (May 5, 2017 Final Rejection at 16).)

In response to this error, the Applicant then rewrote the claims, which ultimately issued as the independent claims of the ’788 patent (claims 1–3) following a Notice of Allowance that provided no reasoning. (EX-1004-117–119 (September 1, 2017 Am. And Resp. to Final Office Action at 2–4); EX-1002 (Buckner Decl.), ¶ 83; EX-1004-127 (Notice of Allowability).)

### *Legal Standard*

Yondr organized its discretionary denial request around the 2020 *Fintiv* factors rather than the factors outlined in Director Stewart's March 26, 2025 Memorandum addressing discretionary denial of IPRs. Accordingly, Be Smarter will respond to Yondr's arguments in the course of addressing Director Stewart's factors:

- whether the Board of another forum has already adjudicated the validity or patentability of the challenged patent claims;
- whether there have been changes in the law or new judicial precedent issued since issuance of the claims that may affect patentability;
- the strength of the unpatentability challenge;
- the extent of the petition's reliance on expert testimony;
- settled expectations of the parties, such as the length of time the claims have been in force;
- compelling economic, public health, or national security interests; and
- any other considerations bearing on the Director's decision.

*See generally* Interim Procedures for PTAB Workload Management, March 26, 2025.

## *Argument*

The foregoing factors weigh in favor of instituting this IPR and rejecting Yondr's discretionary denial request.

### **I. Prior Adjudication of the Challenged Patent Claims.**

The asserted claims have not been substantively reviewed by any tribunal. Yondr asserted the '788 patent in one prior case. (*See* EX-1023, Dkt. 15 (Amended Complaint).) That case, however, concluded with Yondr dismissing the action prior to any claim construction or other substantive decision on the merits. (*See* EX-1024 (stipulation to end the Central District of California action).)

### **II. Changes in the Law.**

There have been no relevant changes in the law.

### **III. Strength of the Challenge.**

Be Smarter's challenge to the validity of the '788 patent is very strong. The claimed invention is a locking pouch. Locking containers of all kinds have been well-known for centuries, from locked vaults, to time capsules, to safety deposit boxes, to lockable storage containers, luggage, and purses.

Examiner error led to allowance of the '788 patent and its progeny. *See* Facts, § III. Yondr convinced the Examiner that by re-writing several originally dependent claims in independent form it could get over Stewart. But the fundamental problem remained. Nothing in those dependent claims added any novelty to the claimed

invention, which the Examiner originally discerned but then erroneously failed to apply to pending claims with the same limitations. *See Facts*, § III. Put another way, even though the examiner rejected numerous claims in light of Stewart and other prior art, the dependent claims that the Examiner allowed when re-written in independent form are still anticipated or rendered obvious by the prior art. *See Facts*, § III.

In its IPR, Be Smarter begins its analysis with the Examiner's error regarding Stewart, but goes much further presenting prior art not considered by the examiner to prove Yondr's asserted claims are both anticipated and obvious under 35 U.S.C. §§ 102 and 103. Accordingly, Yondr's arguments that the prior art relied on in Be Smarter's IPR is "cumulative" ignores critical additional disclosures of the newly-presented prior art over the references cited in the prosecution history of the '788 patent. *See Patent Owner's Brief in Support of Discretionary Denial*, at 1, 13–17.

First, Yondr incorrectly argues Samuel (EX-1005) and Simpson (EX-1008) are cumulative of Coleman (EX-1011). Patent Owner's Brief in Support of Discretionary Denial, at 13–16. In the prosecution history of the '788 patent, the Examiner relied on Coleman for its teaching of "a radio frequency identification tag" in one of the plates to reject pending dependent claims 3, 4, 13, and 14. (EX-1004-069–071, 094–095.) Samuel, however, also teaches a monitoring means 18, which is used to remotely engage and disengage the Samuel locking means by sending

signals to a monitoring system, and contains disclosures regarding alternative case structures such as an “envelope.” (EX-1005, Fig. 1, [0021], [0088]–[0091], [0105]–[0109].) None of these elements are present in Coleman. Similarly, Simpson teaches using both time and location to unlock the case, which are not disclosed in Coleman. (*See, e.g.*, EX-1008, Abstract, [0037]–[0041].) Instead, Coleman teaches that the case has a remotely controlled locking mechanism requiring use of a push button remote similar to a car's key fob. (*See, e.g.*, EX-1011, Figs. 1–2, 1:7–12, 2:38–47.)

Yondr also erroneously argues that Shin (EX-1006) is cumulative of Stewart (EX-1007). Patent Owner's Brief in Support of Discretionary Denial, at 14–15. Yondr, however, does nothing more than point to similarity in structure of the cases in Stewart and Shin. *Id.* at 15. As set forth in Be Smarter's IPR petition, however, Shin contains additional disclosures regarding ways to prevent a cell phone from ringing “in public places where silence is required,” including use of a timer means that automatically opens after a predetermined time and solves the same problem addressed by the '788 patent. (*See, e.g.*, EX-1006, Abstract, 5–6, 9–10.) Shin therefore includes relevant disclosures beyond what the Examiner found Stewart to provide.

#### **IV. Expert Testimony.**

Again, the “technology” at issue in this case is very simple – a locking pouch. Indeed, Yondr rejects any construction of its claims that might make this patent valid

over the prior art such as requiring computer programming that only allows the pouch to unlock upon satisfaction of certain conditions. (*See, e.g.*, EX-2009, at 2–3 (Yondr's claim construction positions in the district court).)

Therefore, no expert testimony is needed here. Be Smarter submitted a declaration along with its IPR petition from a professor with expertise in mechanical engineering, electrical engineering, and computer science out of an abundance of caution. But the Board can readily understand the patent, the prior art, and the issues in this IPR without looking for guidance from expert testimony.

#### **V. Settled Expectations.**

Yondr points to issuance of the '788 patent in 2017 as a basis for discretionary denial, but that date is not dispositive. First, the Board has rejected discretionary denial requests for patents issued in the same time frame, especially where there has been examiner error, as in this case. *See, e.g., Eunsung Global Corp. v. Hydrafacial LLC*, IPR2025-00445, IPR2025-00452, IPR2025-00453, Paper 14, at 2 (referring petitions to the Board including one for a challenged patent that issued in 2017 due to a material error in examination). In addition, the same examiner error that occurred in the prosecution of the '788 patent continues to permeate the subsequent decisions to grant patents on related applications—including the '078 patent, which is both the subject of the district court action and PGR2025-0070. *See Facts*, § III. Indeed, unless the seminal examiner error is cured, Yondr appears intent to pursue

additional patents covering the same alleged invention, prolonging and expanding the impact of the original examiner error. (*See* Paper 9, Patent Owner's Corrected Mandatory Notices, at 1 (listing patents and patent applications that claim priority to application that led to the '788 patent).)

In prior decisions, the Director has noted the importance of examiner error when evaluating discretionary denial requests and weighing “settled expectations.” In cases such as *Skullcandy*, *ControlTec*, and *HydraFacial*, Director Stewart forwarded IPR petitions to the Board for review on the merits because examiner error outweighed any expectations that might otherwise accompany a patent issued in or around 2017. *See Skullcandy, Inc. v. Earin AB*, IPR2025-00690, Paper 9, at 2 (referring petition to the Board where “Petitioner persuasively explains that the patent examiner materially erred during prosecution of the challenged patent” even though the challenged patent had issued nine years prior); *Anthony Inc. v. ControlTec, LLC*, IPR2025-00559, IPR2025-00636, Paper 9, at 2 (referring petitions to the Board where “the Office erred in a manner material to the patentability” by overlooking the teachings of a prior art reference even though challenged patents were in force for 17–18 years); *Eunsung Global Corp. v. Hydrafacial LLC*, IPR2025-00445, IPR2025-00452, IPR2025-00453, Paper 14, at 2 (referring petitions to the Board including one for a challenged patent that issued in 2017 due to a material error in examination).

Demonstrating the significance of the error in prosecution of the '788 patent, Yondr sought to enforce the '788 Patent in 2021, but when facing a validity challenge based on the examiner's error, it avoided any judicial decision on the merits by dismissing the case in exchange for the defendants stipulating to the patent's validity. (EX-1024, at 2.)

In addition, Yondr dismissed another case this summer in which it asserted the newly issued '078 patent against the same party it sued in 2021 after being faced with a serious validity challenge pointing out the examiner error. Specifically, Yondr used a covenant not to sue to dismiss the case to avoid a decision on the merits. (EX-1025, at 2.)

Here, in the district court action, Yondr asserts both the '788 patent and the '078 patent against Be Smarter. Therefore, this proceeding also differs from other proceedings by virtue of Be Smarter challenging both the '788 patent, which issued in 2017, and the newly issued '078 patent. Both patents are invalid, stemming from the same examiner error. Therefore, it makes sense to address that seminal error both in this IPR and PGR2025-0070 to adjudicate this matter once-and-for-all, especially in light of Yondr's ongoing efforts to obtain even more patents in the same space.

In summary, expectations are far from settled, Yondr has repeatedly sought to block or intimidate competitors with multiple patents born out of the same examiner error while avoiding any merits-based adjudication of that error. Indeed, Yondr still

has a pending patent application and thus is working to obtain at least one additional patent further compounding the error. (*See* Paper 9, Patent Owner's Corrected Mandatory Notices, at 1 (listing patents and patent applications that claim priority to application that led to the '788 patent).)

## **VI. Compelling Economic, Public Health, or National Security Interests.**

As described above, Yondr is using the challenged '788 patent, along with its newly issued '078 patent (not to mention additional patents in the pipeline) to intimidate other potential competitors and their customers. For example, as described above, Yondr was involved in two prior lawsuits against another company, Win Elements, selling these simple locking pouches. In both cases, Yondr provided sought dismissal before any adjudication of the examiner error or other prior art on the merits.

Here, Yondr also is trying to intimidate customers. The products at issue in the district court action are pouches that lock and can be used to hold cellular phones so that students cannot use their phones in class. There is a growing consensus that cell phone use in school is a distraction that is detrimental to educating our children. Attempting to address this issue, public schools increasingly are interested in ways to stop cell phone use in the classroom. Both Yondr and Be Smarter sell locking pouches that may help achieve that goal.

Public schools, however, have limited taxpayer-funded budgets that they must stretch to provide everything from teachers' salaries to campus security. Therefore, whether or not Yondr has a valid patent—and, thus, a valid monopoly—over such locking pouches is an issue that impacts not just Yondr and Be Smarter, but also schools, parents, kids, and taxpayers nationwide. Put another way, there is a strong public interest in this Board assessing the validity of Yondr's patents, especially when Yondr has both a live patent application and a history of using its patents to intimidate competition and then avoid any decisions on the merits in the district courts.

## **VII. Other Factors.**

Finally, Yondr argues that a 2026 trial date in the parallel district court case justifies discretionary denial, but Yondr leaves aside several critical details.

First, notwithstanding any aspirational trial date in the district court's OGP, the reality is, the Western District of Texas is ranked as one of the most overburdened judicial district in the country. As a result, federal court statistics reveal that the actual median time from claim construction to trial in that court is 531 days. (EX-1020.) Thus, a September 2025 claim construction hearing likely means a trial no sooner than early 2027.

Yondr argues the parties are “substantially invested” in the district court case (Yondr Motion at 8), but that is not accurate. Yondr has been in no hurry to push the

district court case forward consistent with its behavior in its prior cases against Win Elements. Yondr waited four months before proposing a Rule 26(f) scheduling conference, and it never filed the required Case Readiness Status Report. Yondr did not even submit a scheduling order in that case until two weeks ago. The only work completed by the parties has been the exchange of preliminary contentions and claim construction briefs. Fact discovery has not begun. Indeed, contrary to Yondr's argument, Be Smarter has filed a motion to stay the case (EX-1021)—a motion that Judge Albright has granted in at least 22 other cases. (EX-1022.)

In the end, the Final Written Decision in this IPR (due in December 2026) and the Final Written Decision in the related PGR2025-0070 (due in January 2027) are highly likely to issue before any trial of this case in the district court.

### ***Conclusion***

For these reasons, Be Smarter respectfully requests that the Patent Office reject Patent Owner Yondr's discretionary denial request and institute its Petition for *Inter-Partes* Review of U.S. Patent No. 9,819,788.

Petitioners' Response to Patent Owner's Brief in Support of  
Discretionary Denial Under 35 U.S.C. § 314(a)  
IPR2025-00970

Dated: August 27, 2025

Respectfully submitted,

/s/ Leisa Talbert Peschel

Leisa Talbert Peschel

USPTO Registration No. 62,248

Lead Counsel for Petitioners

### **CERTIFICATE OF WORD COUNT**

Pursuant to 37 C.F.R. § 42.24 and the Interim Processes for PTAB Workload Management, the undersigned attorney for Petitioners declares that the relevant portions of this Response has 3,831 words, according to the word count tool in Microsoft Word.

Dated: August 27, 2025

Respectfully submitted,

/s/ Leisa Talbert Peschel

Leisa Talbert Peschel

USPTO Registration No. 62,248

Lead Counsel for Petitioners

## CERTIFICATION OF SERVICE

The undersigned certifies that on August 27, 2025, a copy of the foregoing  
Petitioners' Response to Patent Owner's Brief in Support of Discretionary Denial  
Under 35 U.S.C. § 314(a) has been served via electronic mail upon the following,  
who has agreed to accept service on behalf of Patent Owner:

Stephen C. Jensen (Reg. No. 35,556)  
Rhett D. Ramsey (Reg. No. 78,415)  
KNOBBE, MARTENS, OLSON & BEAR, LLP  
2040 Main Street, Fourteenth Floor  
Irvine, CA 92614  
[2SCJ@knobbe.com](mailto:2SCJ@knobbe.com)  
[2RXR@knobbe.com](mailto:2RXR@knobbe.com)  
[YondrIPR970@knobbe.com](mailto:YondrIPR970@knobbe.com)

and, by email upon counsel of record for the Patent Owner in the litigation  
before the United States District Court for the Western District of Texas:

Jeremiah S. Helm  
Stephen C. Jensen  
Rhett D. Ramsey  
KNOBBE, MARTENS, OLSON & BEAR, LLP  
2040 Main St., 14th Floor  
Irvine, CA 92614  
[Jeremiah.helm@knobbe.com](mailto:Jeremiah.helm@knobbe.com)  
[2SCJ@knobbe.com](mailto:2SCJ@knobbe.com)  
[Rhett.Ramsey@knobbe.com](mailto:Rhett.Ramsey@knobbe.com)

Ben K. Shiroma  
KNOBBE, MARTENS, OLSON & BEAR, LLP  
1925 Century Park E #400  
Los Angeles, CA 90067  
[Ben.Shiroma@knobbe.com](mailto:Ben.Shiroma@knobbe.com)

Petitioners' Response to Patent Owner's Brief in Support of  
Discretionary Denial Under 35 U.S.C. § 314(a)  
IPR2025-00970

Robert Pierce Earle  
Stephen Burbank  
SCOTT DOUGLASS & MCCONNICO LLP  
303 Colorado Street, Suite 2400  
Austin, TX 78701  
[Rearle@scottdoug.com](mailto:Rearle@scottdoug.com)  
[Sburbank@scottdoug.com](mailto:Sburbank@scottdoug.com)

*/s/ Leisa Talbert Peschel*  
Leisa Talbert Peschel  
USPTO Registration No. 62,248  
Lead Counsel for Petitioners