

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner

v.

DYNAMIC MESH NETWORKS, INC.
D/B/A MESH DYNAMICS,
Patent Owner

U.S. Patent No. 8,520,691
Issue Date: August 27, 2013

Title: PERSISTENT MESH FOR ISOLATED MOBILE AND TEMPORAL
NETWORKING

Inter Partes Review No. IPR2026-00008

PATENT OWNER'S AUTHORIZED SUPPLEMENTAL BRIEFING

PATENT OWNER’S EXHIBIT LIST

Exhibit No.	Description
2001	[Reserved]
2002	Cisco’s Answer to Dynamic Mesh Networks, Inc.’s Complaint for Patent Infringement, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781 (EDTX), Dkt. 29 (September 18, 2025)
2003	Declaration of Mr. Francis daCosta in Support of Patent Owner’s Request for Discretionary Denial
2004	June 22, 2022 Letter to Chief Executive Officer of Cisco Systems, Inc., Charles H. Robbins, from Mr. Francis daCosta, founder of MeshDynamics
2005	August 2009 Presentation entitled “High Level Overview” provided to Cisco Systems, Inc.
2006	Cisco’s Amended Complaint, <i>Cisco Systems, Inc. v. Dynamic Mesh Networks, Inc. d/b/a MeshDynamics et al.</i> , No. 5-25-cv-06441 (NDCA), Dkt. 5 (July 31, 2025)
2007	MeshDynamics’ Notice of Readiness, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781 (EDTX), Dkt. 32 (September 19, 2025)
2008	Judge Wise’s Civil Standing Order in Northern District of California, available at https://cand.uscourts.gov/sites/default/files/standing-orders/NW-CivilStandingOrder_05-06-25.pdf
2009	Docket, <i>Cisco Systems, Inc. v. Dynamic Mesh Networks, Inc. d/b/a MeshDynamics et al.</i> , No. 5-25-cv-06441 (NDCA)
2010	MeshDynamics’ Local Rule 3-1 and 3-2 Initial Disclosures, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00472 (EDTX) (July 18, 2025)
2011	Judge Gilstrap’s Order Setting Scheduling Conference, <i>Dynamic</i>

	<i>Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781 (EDTX), Dkt. 35 (October 29, 2025)
2012	Judge Gilstrap’s Patent Model Docket Control Order, available at https://coop.txed.uscourts.gov/?q=judge/district-judge-rodneygilstrap
2013	MeshDynamics’ Local Rule 3-1 and 3-2 Initial Disclosures, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781 (EDTX) (November 10, 2025)
2014	MeshDynamics’ Local Rule 3-1 and 3-2 Initial Disclosures, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00783 (EDTX) (November 10, 2025)
2015	MeshDynamics’ Response to Cisco’s Motion to Transfer or Stay Pursuant to First-to-File Rule, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781, Dkt. 34 (EDTX) (October 28, 2025)
2016	Docket Control Order, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781, (EDTX) Dkt. 40 (December 11, 2025)
2017	Email chain between Michael Rhodes, counsel for Cisco, and Elizabeth Bernard, counsel for MeshDynamics, confirming dismissal with prejudice of U.S. Patent No. 11,368,537
2018	Disclaimer of U.S. Patent No. 11,368,537
2019	Stipulation of Voluntary Dismissal as to U.S. Patent No. 11,368,537, <i>Dynamic Mesh Networks, Inc. et al. v. Cisco Systems, Inc.</i> , No. 2:25-cv-00781, (EDTX) Dkt. 45 (December 18, 2025)
2020	Docket, <i>Zophonos Inc. v. Samsung Electronics America, Inc. et al.</i> , Case No. 2-25-cv-00752 (EDTX July 30, 2025)
2021	Docket, <i>Mingoe Consulting LLC v. ASUSTeK Computer, Inc.</i> , Case No. 2-25-cv-00770 (EDTX August 6, 2025)

2022	Order Granting Motion to Dismiss and Terminating Motion to Consider Whether Another Party’s Material Should Be Sealed, <i>Cisco Systems, Inc. v. Dynamic Mesh Networks, Inc. d/b/a MeshDynamics et al.</i> , No. 5-25-cv-06441 (NDCA), Dkt. 67 (Jan. 8, 2026)
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Patent Owner MeshDynamics submits the following supplemental information relating to *Fintiv* Factors 2 and 5. On January 8, 2026, Judge Wise dismissed Petitioner’s Northern District of California declaratory judgment action. Ex. 2022. In view of this Order, the only district court venue involving the ’691 patent is the Eastern District of Texas, with a scheduled March 15, 2027 trial date. The Board’s Final Written Decision (“FWD”) date is April 20, 2027. Therefore, the Eastern District of Texas trial is scheduled before the FWD is due. *Nvidia Corp. v. Neural AI, LLC*, IPR2025-00606, Paper 18, 2 (PTAB July 31, 2025); *Shenzen Tuozhu Technology Co., Ltd. v. Stratasy, Inc.*, IPR2025-00354, Paper 11, 2 (PTAB June 12, 2025) (“[I]t will be inefficient to maintain two parallel proceedings when the... scheduled trial date and the projected [FWD] are in close proximity.”). This trial date is unlikely to change. Ex. 2016, 5 (The trial date “cannot be changed without an acceptable showing of good cause.”).

As for *Fintiv* Factor 5, the parties’ investment in the Eastern District of Texas litigation has progressed. Petitioner served its invalidity contentions and Patent Owner is reviewing source code. Ex. 2016, 4.

In view of the dismissal of the Northern District of California declaratory judgment proceeding and the parties’ further investment in the remaining litigation in the Eastern District of Texas, the totality of circumstances and *Fintiv* factors 2 and 5 weigh even more in favor of discretionary denial.

Dated: January 14, 2026

Respectfully submitted,

By: /s/ Elizabeth Bernard

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER'S
AUTHORIZED SUPPLEMENTAL BRIEFING was served electronically via email
on January 14, 2026, on the following counsel of record for Petitioner:

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