

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

Inter Partes Review No. IPR2026-00008
U.S. Patent No. 8,520,691

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

I. INTRODUCTION1

II. THE '691 PATENT2

 A. Isolated Mobile Mesh Networks2

 B. The Claims of the '691 Patent.....5

III. LEVEL OF ORDINARY SKILL7

IV. CLAIM CONSTRUCTION8

V. PETITIONER FAILS TO DEMONSTRATE A REASONABLE
LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE
UNPATENTABLE.....8

 A. Statement of Material Facts.....10

 B. Castagnoli and Bauer Do Not Teach Or Suggest “one of the structured
mesh nodes acts as an isolated network root of the isolated
configuration and all remaining nodes connect to the isolated network
root node as isolated root children nodes forming a tree configuration”
(limitations [1.7] and [35.8])11

 C. Bauer does not teach or suggest “wherein clients of [nodes of the
structured network / the at least two structured mesh nodes] in a
second isolated configuration retain full connectivity within the
structured network during the isolated configuration” (limitation [1.8]
and [35.9])16

VI. CONCLUSION.....18

TABLE OF AUTHORITIES

Statutes

35 U.S.C. § 314(a).....1

Other Authority

37 C.F.R. § 42.107.....1

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	[reserved]
2011	Judge Gilstrap’s Order Setting Scheduling Conference, <i>Dynamic 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-rodney-gilstrap
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 Aug. 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)

Pursuant to 35 U.S.C. § 314(a) and 37 C.F.R. § 42.107, Dynamic Mesh Networks, Inc. d/b/a MeshDynamics (“MeshDynamics” or “PO”) files this preliminary response setting forth merits and non-discretionary reasons why institution of the Petition for *inter partes* review (“IPR”) of claims 1, 9-11, 15-16, 18-19, and 35 (the “challenged claims”) of U.S. Patent No. 8,520,691 (“the ’691 patent”), as requested by Petitioner Cisco Systems, Inc. (“Cisco”), should be denied.

I. INTRODUCTION

The Petition fails to establish a reasonable likelihood that any of the challenged claims are unpatentable. The Petition alleges that three references combined (Castagnoli, Bauer, and Gil) render the independent claims obvious. But despite using three different references, several independent claim limitations are completely missing from the asserted references. This preliminary response addresses two of these missing limitations.

First, the asserted references do not teach or suggest “one of the structured mesh nodes acts as an isolated network root of the isolated configuration and all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration.” The concept of a root node having all remaining nodes connected to the root node in a tree configuration is missing from Castagnoli and Bauer. While Petitioner draws a modified Castagnoli Figure 1 to make it look more like it meets this limitation, nothing in Castagnoli supports Petitioner’s

modification. Instead, Petitioner, through its unsupported modification of Castagnoli Fig. 1, is supplying the claimed topology, not Castagnoli. The claim limitation is completely missing from Castagnoli and Bauer.

Second, Bauer does not teach or suggest the claim limitation “wherein clients of nodes of the structured network in a second isolated configuration.” Bauer has no clients in its disconnected mode because every computing device on Bauer’s disconnected network acts as an ad-hoc network node that can connect to any other node. There is no client-node configuration in Bauer’s disconnected mode.

Accordingly, because the asserted references do not teach or suggest several limitations from each independent claim, Petitioner cannot demonstrate a reasonable likelihood of success that any challenged claim is unpatentable. Thus, this IPR may not be instituted.

II. THE '691 PATENT

A. Isolated Mobile Mesh Networks

The '691 Patent “relates to wireless mesh networks and in particular mesh networks used for mobile applications where continuity of operation is critical.” Exhibit 1001 ['691 Patent], 1:32-34. The '691 Patent discloses “clusters of mesh nodes” where each node in the cluster can remain in communication with the other nodes even when the cluster is isolated from an external network. *Id.*, 1:34-39.

The '691 Patent explains the concept of mesh nodes as follows:

In mesh architectures, mesh nodes act as central structural elements providing means of connectivity to a broad range of client devices. In some embodiments of the invention, mesh nodes are wireless access points. Each client device communicates with an available mesh node or access point. The communication between client devices and access points may occur using any means.

A “mesh” forms when a set of access points establishes communication with one another. The communication between the access points forms the strands of an ethereal mesh. Client devices sit in the spaces between the strands and establish communication with the access points which are found at the intersections of the mesh strands.

Exhibit 1001 [’691 Patent], 1:44-56.

However, the ’691 Patent identifies certain problems in existing wireless mesh networks, such as limited bandwidth and scaling issues with prior art “hub-like” systems. Exhibit 1001 [’691 Patent], 1:57-3:2.

To address these problems, the ’691 Patent introduces a “two-radio mesh network, where each mesh node includes one radio for the uplink backhaul and another servicing clients and providing the downlink backhaul to other nodes (descendent nodes) of the network.” Exhibit 1001 [’691 Patent], 3:3-9. The resulting network forms a “hierarchical tree-like network topology” referred to as a “Structured Mesh.” *Id.*, 3:9-15.

This “Structured Mesh” topology may include “distributed routing tables”

such that “each node only contains information related to its descendant nodes and its parent node, but no other nodes in the network hierarchy tree above its parent.” *Id.*, 3:15-19. The distributed routing table decreases the processing load for each node. *Id.*, 3:19-20.

One of the objects of the '691 Patent is to “maintain connectivity with a mesh network, when connections to external networks are compromised.” *Id.*, 3:66-4:1. Thus, “network connectivity within a sub-part of the mesh network is maintained during the time the sub-part of the mesh network is not connected to an external network.” *Id.*, 4:1-4.

Figure 4 illustrates one embodiment of the mesh structure of the '691 Patent comprising two sub-networks 410 and 430:

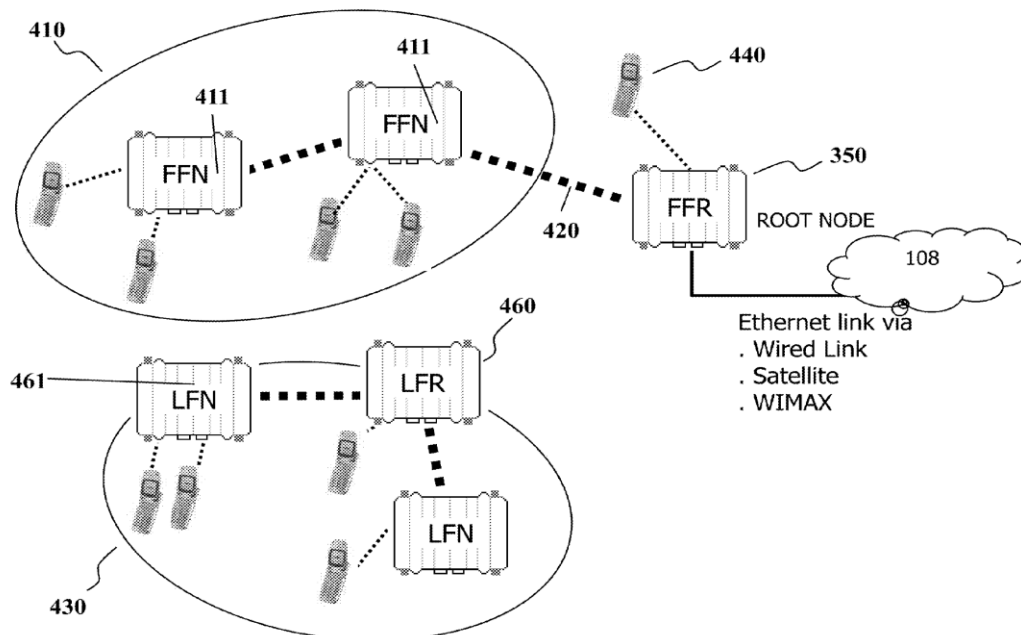


Figure 4

Id., 8:49-52. In Figure 4, node 350 is a “full function root node” because it is communicating with external network 108. *Id.* Sub-network 410 is connected through connection 420 to full function root node 350. Because sub-network 410 is connected through full function root node 350 to the external network 108, nodes 411 within sub-network 410 are considered full function nodes. *Id.*, 8:52-54. Conversely, network 430 is an isolated network because it is unable to establish communication with any full function nodes. *Id.*, 8:62-64. Thus, nodes 461 and 460 are considered limited function nodes because they do not include a connection to the external network. *Id.*, 6:12-14. However, the clients (e.g., mobile phones) of these limited function nodes retain connectivity to and can communicate with the other clients within isolated network 430. *Id.*, 8:10-14. “In one embodiment, the limited functionality nodes of the sub-network 430 continuously scan in an attempt to establish connectivity between the limited functionality nodes and a full functionality node.” *Id.*, 9:5-8.

B. The Claims of the '691 Patent

The '691 Patent contains only three independent claims (1, 20 and 35). Exhibit 1001 ['691 Patent]. Only independent claims 1 and 35 (along with dependent claims 9-11, 15-16 and 18-19 that depend from claim 1) are challenged in this IPR. Both Claim 1 and claim 35 are directed to a structured mesh network capable of isolated operation. *Id.* at cls. 1, 35.

Claim 1 is reproduced below:

[1.0]	A structured mesh network capable of isolated operation, comprising:
[1.1]	at least two structured mesh nodes;
[1.2]	wherein each structured mesh node comprises at least a connectivity logic;
[1.3]	an uplink radio operating on an uplink frequency and a downlink radio operating on a distinct downlink frequency;
[1.4]	wherein the connectivity logic determines whether each structured mesh node connects with an external network or another node using its uplink radio and client devices or other mesh nodes connect to each node using each node's downlink radio;
[1.5]	wherein the structured mesh network functions in two configurations selected depending on whether a connection to an external network is present;
[1.6]	in the first connected configuration the structured mesh network includes at least one structured mesh node's uplink radio comprising a connection to an external network; and
[1.7]	in the second isolated configuration none of the structured mesh nodes' uplink radio comprises a connection to an external network,

	and one of the structured mesh nodes acts as an isolated network root of the isolated configuration and all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration;
[1.8]	wherein clients of nodes of the structured network in a second isolated configuration retain full connectivity within the structured network during the isolated configuration and
[1.9]	wherein said client connectivity is uninterrupted during any transition from the isolated configuration to the first connected configuration;
[1.10]	wherein distinct downlink frequencies are used by nodes for communication with one or more nodes lower on the tree configuration.

EX1001 [’691 Patent], cl. 1. Claim 35 is similar to claim 1. One notable difference is that claim 35 has an additional limitation requiring “the connectivity logic in each node contains a distributed routing table.” *Id.*

III. LEVEL OF ORDINARY SKILL

Petitioner alleges the following level of ordinary skill:

A Person of Ordinary Skill in The Art (“POSITA”) in January 2009 would have had a working knowledge of the wireless networking art

that is pertinent to the '691 patent, including familiarity with standards such as IEEE 802.11. Ex.1003, ¶20 (citing Ex.1011, 3). A POSITA would have had a bachelor's degree in computer science, electrical engineering, or equivalent training, and approximately two years of professional experience working in the field of network communications. Additional work experience could have been substituted for educational experience, and vice versa. Ex.1003, ¶21.

Pet., 9-10. For purposes of this preliminary response, Patent Owner does not dispute Petitioner's level of ordinary skill.

IV. CLAIM CONSTRUCTION

Petitioner alleges that “[f]or the purposes of this proceeding and the grounds presented herein, Petitioner proposes that no claim terms require formal construction.” Pet., 10. For purposes of this preliminary response, Patent Owner does not believe any claim terms need construction. Patent Owner reserves the right to propose claim terms for construction should this IPR be instituted.

V. PETITIONER FAILS TO DEMONSTRATE A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE

The Petition presents three grounds. Ground 1 alleges that claims 1, 18 and 35 are unpatentable over Castagnoli (Exhibit 1005), Bauer (Exhibit 1006), and Gil (Exhibit 1008). Pet., 11. Ground 2 alleges that dependent claims 9-11 and 15-16 are unpatentable over Castagnoli, Bauer, Gil, and Zeng (Exhibit 1007). *Id.* Ground 3 alleges claim 19 is unpatentable over Castagnoli, Bauer, Gil, and Papadoglou

(Exhibit 1009). *Id.* This POPR focuses on Ground 1 because Ground 1 is the only ground directed to independent claims 1 and 35.

Petitioner's use of a three-reference obviousness combination for the challenged independent claims is a tacit admission that none of the prior art discloses all the limitations of any claim. *See* Pet. at 11. But even all three references combined do not teach or suggest every limitation of the independent claims. To address this issue, Petitioner modifies Figure 1 in Castagnoli to more closely resemble the system disclosed in the '691 Patent. As discussed in more detail below, these modifications are not reflected in Castagnoli or the other asserted references. Instead, the modifications reflect what Petitioner wished Castagnoli disclosed, rather than what Castagnoli actually discloses.

Petitioner argues that Castagnoli and Bauer disclose "one of the structured mesh nodes acts as an isolated network root of the isolated configuration and all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration." Pet., 54-59. Neither Castagnoli nor Bauer, whether alone or combined, disclose a network root node, where all remaining nodes connect to the one root node in a tree configuration. Instead, Petitioner relies on its modified drawing of Castagnoli Fig 1. But Petitioner's modifications are not reflected in the disclosure of Castagnoli. Nothing in Castagnoli Figure 1 discusses using a network root node with all remaining nodes as root children nodes. Petitioner

simply modifies Castagnoli Figure 1 to make Castagnoli look more like the invention claimed in the '691 Patent.

Other limitations are simply missing from the proposed 3-way combination. For example, Petitioner identifies no disclosure from Castagnoli, Bauer or Gil that discloses the limitation “wherein clients of nodes of the structured network in a second isolated configuration retain full connectivity within the structured network during the isolated configuration” Pet., 59-60 (limitation [1.8]), 71 (similar limitation [35.9]). Petitioner relies on Bauer’s computing devices as allegedly disclosing “clients of nodes ... in a second isolated configuration retain full connectivity.” *Id.*, 60 (citing Exhibit 1006 [Bauer], [0023]). But Bauer’s computing devices (allegedly the '691 Patent’s clients) function as ad-hoc nodes that may connect in any manner to other computing devices in Bauer’s disconnected mode. *Infra*, §V.C. Thus, Bauer lacks the concept of a client/node relationship in its disconnected mode.

At least for these reasons, Petitioner has failed to demonstrate a reasonable likelihood that any of the Asserted Grounds renders the challenged claims obvious.

A. Statement of Material Facts

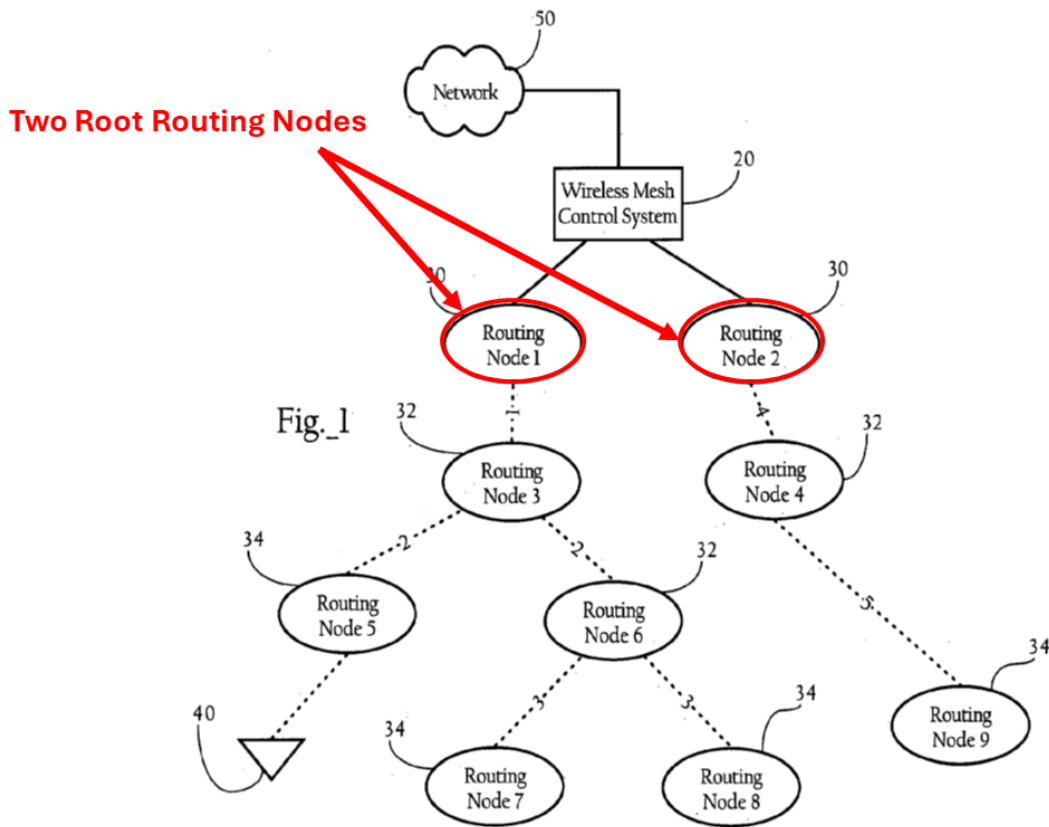
The Petition includes a section on alleged statements of material facts. Pet., 12-13. These statements are alleged background knowledge of a POSITA recast as “material facts.” *Id.* To the extent a response is required for purposes of this

preliminary response, Patent Owner denies each material fact. Patent Owner reserves its rights to respond further to Petitioner's alleged material facts in its Patent Owner Response if this IPR is instituted.

B. Castagnoli and Bauer Do Not Teach Or Suggest “one of the structured mesh nodes acts as an isolated network root of the isolated configuration and all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration” (limitations [1.7] and [35.8])

The Petition alleges Castagnoli and Bauer render this limitation obvious. Pet., 54, 69. Neither Castagnoli nor Bauer discloses this limitation. Petitioner relies on its modified and annotated drawing of Castagnoli Figure 1 as disclosing an isolated network root node. Pet., 55-56. But the modified drawing at Petition page 56 does not reflect what is disclosed in Castagnoli or Bauer. Nothing in Castagnoli suggests splitting Castagnoli Figure 1 into two different networks. The rationale for Petitioner's modification is to create something that looks more like the invention disclosed in the '691 Patent.

Castagnoli Figure 1 does not disclose (1) one of the structured mesh nodes acts as an isolated network root of the isolated configuration, or (2) that all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration. Castagnoli Figure 1 below (annotated and unmodified) shows this:



First, Castagnoli does not disclose one isolated root node. Setting aside that the concept of isolated networks is completely missing from Castagnoli¹, Castagnoli Fig. 1 does not disclose one root node connected to an external network. Castagnoli consistently describes Figure 1 as including a single wireless mesh network. See, e.g., Ex. 1005 at ¶¶ [0012], [0033]. Castagnoli Fig. 1 discloses two root nodes 30—Root Routing Node 1 and Root Routing Node 2 connect to a Wireless Mesh Control System 20 that connects to Network 50. Thus, Castagnoli Figure 1 discloses two—not one—root node connected to an external network.

¹ Petitioner alleges Bauer teaches isolated networks. Pet., 54-58.

Further, Castagnoli does not disclose that “all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration.” Exhibit 1001 [’691 Patent], cl. 1. In Castagnoli Fig. 1, there are two routing nodes connected to the Wireless Mesh Control System 20. Thus, Castagnoli Fig. 1 does not disclose the concept of one root routing node serving as a root for all other routing nodes in an isolated configuration. As a corollary, the remaining nodes in Castagnoli are not necessarily children nodes and may become root nodes themselves. Thus, Castagnoli does not disclose that only one node forms the root node and all remaining nodes are children nodes of that root node in an isolated configuration.

Bauer does not supply this missing limitation. Bauer lacks the concept of a tree configuration. In Bauer Figure 1 (the “disconnected” embodiment, below), Bauer’s ad-hoc nodes lack any formal structure:

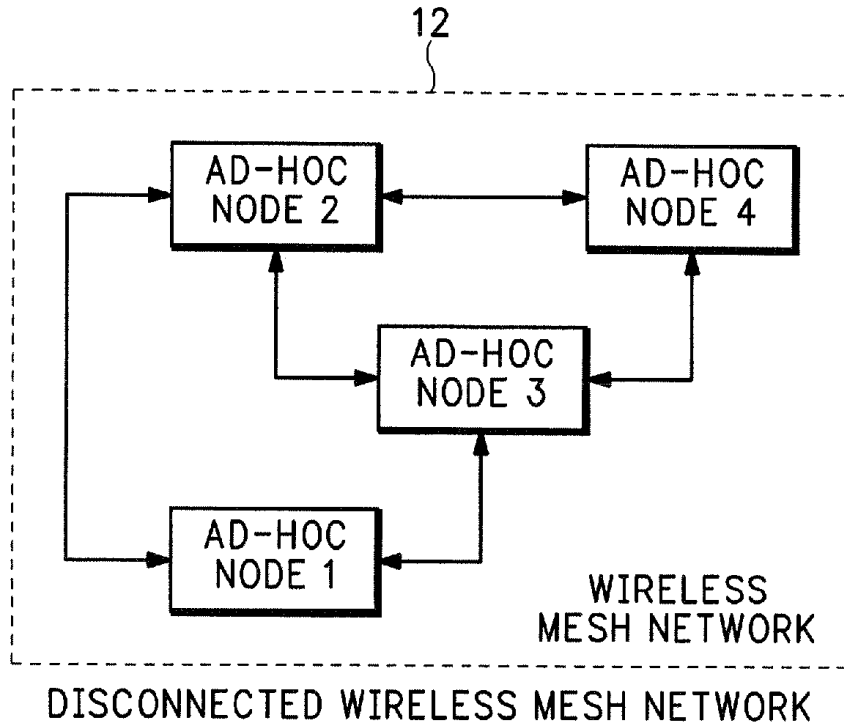


FIG.1

Exhibit 1006 [Bauer], Fig. 1. As the word “ad-hoc” implies, any of Bauer’s “ad-hoc nodes” “may communicate directly with other nodes in the mesh network 12” or “may communicate indirectly to other nodes through one or more intermediary nodes.” *Id.*, [0024]. Thus, Bauer Fig. 1 has no concept of a fixed topology, let alone a tree topology with one node as a root network node, whether in isolated mode or otherwise.

As a result, Bauer does not disclose “all remaining nodes connect to the isolated network root node as isolated root children nodes forming a tree configuration” because Bauer lacks any one isolated network root node to which all

remaining nodes connect in an isolated configuration. Again, Bauer lacks any fixed topology. As shown in Bauer Fig. 2, Bauer discloses multiple ad-hoc nodes (nodes 2 and 4) connecting to the Internet rather than one root node:

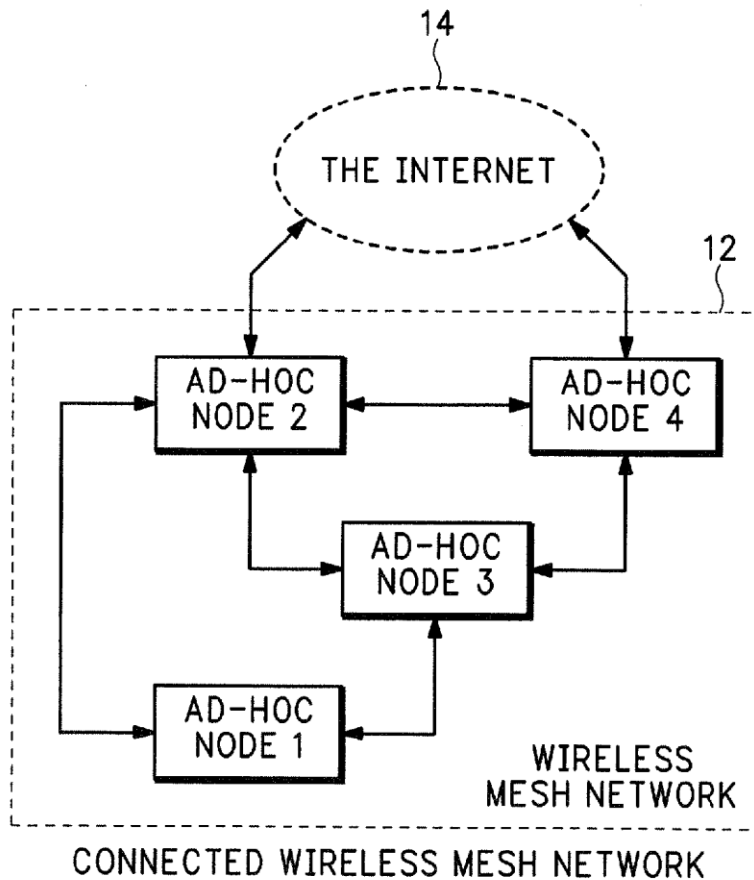


FIG.2

Exhibit 1006 [Bauer], Fig. 1. Thus, in Bauer, none of the nodes are a root node because the nodes connect ad-hoc with one another. Bauer lacks any disclosure regarding one root node, the remainder of the nodes being children, or the nodes forming a tree configuration.

Because neither Castagnoli nor Bauer disclose this limitation, Petition cuts

out portions of Castagnoli Fig. 1 to create a modified Castagnoli Figure 1 that looks more like the invention of the '691 Patent with one root node. Pet, 30-31, 33. But nothing in Castagnoli suggests Petitioner's modification. Instead, Petitioner's modification is pure hindsight.

Petitioner attempts to justify its hindsight modification of Castagnoli Fig. 1 by relying on catch-all disclosure in the last paragraph of Castagnoli stating that “the functionality of mesh network control system 20 may be integrated into other network devices, such as root routing nodes 30.” Pet., 31. But this disclosure suggests moving the control functionality into a plurality of nodes (“root routing nodes 30” plural), it does not suggest Castagnoli should be confined to an isolated network root node to which all remaining nodes connect as children nodes.

Because neither Castagnoli nor Bauer disclose this limitation, the combination of Castagnoli and Bauer does not render claims 1 and 35 obvious.

C. Bauer does not teach or suggest “wherein clients of [nodes of the structured network / the at least two structured mesh nodes] in a second isolated configuration retain full connectivity within the structured network during the isolated configuration” (limitation [1.8] and [35.9])

The Petition argues that Castagnoli in view of Bauer teaches these limitations. Pet., 60, 71. The Petition alleges Bauer discloses clients of nodes retain full connectivity during the isolated configuration: “Bauer teaches that wireless clients such as ‘Personal Computers (PCs), Personal Digital Assistants (PDAs), cellular

telephones with IP capabilities, digital pagers,’ or other computing devices ‘are capable of sending, receiving, and forwarding IP packets directly to other’ wireless clients when the mesh network is ‘disconnected from an Internet infrastructure.’” Pet., 60 (quoting Ex.1006 [Bauer], [0023]). Thus, Petitioner’s alleged “wireless clients” are identified in Bauer as “computing devices” such as “Personal Computers (PCs), Personal Digital Assistants (PDAs), cellular telephones with IP capabilities, digital pagers, or any other IP device that may need to operate in a mesh network.” Exhibit 1006 [Bauer], [0023].

Bauer does not disclose “clients of nodes” because Bauer’s “ad-hoc nodes” *are* its computing devices. Exhibit 1006 [Bauer], [0023] (“nodes 1-4 can be Personal Computers (PCs), Personal Digital Assistants (PDAs), cellular telephones with IP capabilities, digital pagers, or any other IP device that may need to operate in a mesh network.”). Further, Bauer discloses that “[a]ny of nodes 1-4 may communicate directly with other nodes in the mesh network 12.” *Id.*, [0024]. That is, each computing device *is* a node and interconnects with other nodes in an ad-hoc manner. There is no concept of clients in Bauer’s disconnected mode. Figure 1 illustrates this relationship:

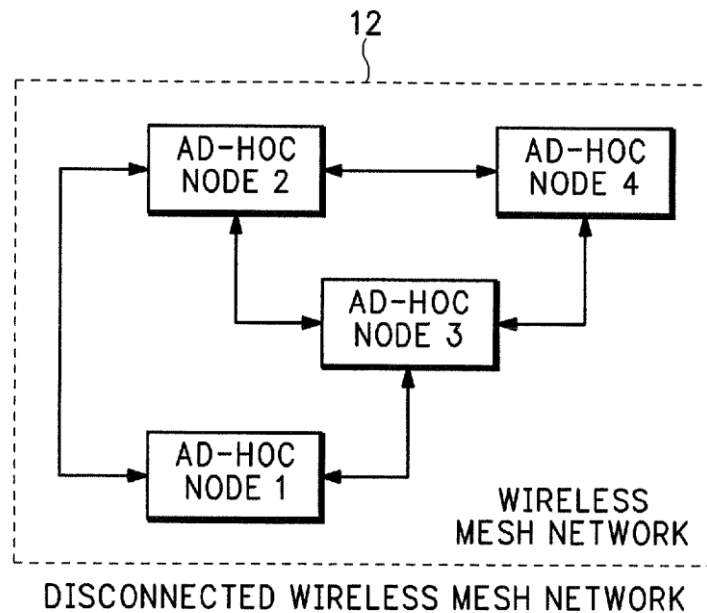


FIG.1

Exhibit 1006 [Bauer] [Fig. 1]. As Bauer Fig. 1 illustrates, in the disconnected mode, each user device acts as its own ad-hoc node. They are not clients of any other nodes.

Thus, Bauer does not teach or suggest “clients of nodes ... in an isolated configuration.” For this additional reason, the Petition cannot demonstrate a reasonable likelihood that Castagnoli and Bauer render the challenged claims unpatentable.

VI. CONCLUSION

For at least the foregoing reasons, Petitioner has failed to demonstrate a reasonable likelihood that any challenged claim is unpatentable. Thus, institution of this *inter partes* review must be denied.

Dated: January 20, 2026

Respectfully submitted,

By: */s/ Elizabeth Bernard*

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), Patent Owner certifies that this Patent Owner Preliminary Response has 3,225 words as counted by the word-processing system used to prepare this document. This word count complies with the 14,000-word limit under 37 C.F.R. § 42.24(b)(1).

Dated: January 20, 2026

Respectfully Submitted,

By: /s/ Elizabeth Bernard
Elizabeth Bernard
USPTO Reg. No. 51,465

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Patent Owner Preliminary Response was served electronically via email on January 20, 2026, on the following counsel of record for Petitioner:

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