UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner

v.

AUTOCONNECT HOLDINGS LLC,
Patent Owner

Case No. IPR2026-00173
Patent No. 9,173,100

PATENT OWNER'S PRELIMINARY RESPONSE

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

I. INTRODUCTION 1

II. THE PETITION SHOULD BE DENIED BECAUSE OF FORD'S INCONSISTENT TREATMENT OF INDEFINITENESS 2

A. Legal Standard 2

B. Ford Attempts to "Have it Both Ways" Without a Sufficient Explanation" 4

III. THE PETITION IS DEFECTIVE BASED ON AN EVIDENTIARY FAILURE 9

A. The Petition Fails to Meet Statutory and Regulatory Requirements 9

B. Ford Failed to Prove "Bosch" is a Printed Publication 11

IV. THE PETITION SHOULD BE DENIED BECAUSE FORD FAILS TO SHOW A REASONABLE LIKELIHOOD OF SUCCESS FOR AT LEAST ONE CHALLENGED CLAIM 12

A. Ford's Ground 1 fails to show that claims 1-24 are obvious over Amirtahmasebi and Bosch 13

1. Independent claim 1 13

2. Independent claims 9 and 17 15

3. Dependent claims 2-8, 10-16, and 18-24 15

B. Ford's Ground 2 fails to show that claims 1, 9, and 17 are obvious over Spaur and Peirce 16

1. Independent claim 1 16

2. Independent claims 9 and 17 17

V. CONCLUSION 17

TABLE OF AUTHORITIES

Cases

Arendi S.A.R.L. v. Apple Inc.,
832 F.3d 1355 (Fed. Cir. 2016) 14

Belden Inc. v. Berk-Tek LLC,
805 F.3d 1064 (Fed. Cir. 2015) 14

Blue Calypso, LLC v. Groupon, Inc.,
815 F.3d 1331 (Fed. Cir. 2016) 11

Generac Power Sys., Inc. v. Champion Power Equip., Inc.,
IPR2025-00805, Paper 40 (Director Feb. 3, 2026) 3

Hulu, LLC v. Sound View Innovations, LLC,
IPR2018-01039, Paper 29 (POP December 20, 2019) 12

In re Cronyn,
890 F.2d 1158 (Fed.Cir.1989) 11

InTouch Techs., Inc. v. VGO Commc'ns, Inc.,
751 F.3d 1327 (Fed. Cir. 2014) 14

Revvo Techs. v. Cerebrum Sensor Techs.,
IPR2025-00632, Paper 20 (Director Nov. 3, 2025) 2, 3

Tesla, Inc. v. Intellectual Ventures II LLC,
IPR2025-00340, Paper 18 (Director Nov. 5, 2025) 3, 8

Statutes

35 U.S.C. § 311(b) 9, 11

35 U.S.C. § 312(a) 12

35 U.S.C. § 312(a)(3)(A) 10

Regulations

37 C.F.R. § 42.104(b)(3) 2, 4

37 C.F.R. § 42.104(b) 10

37 C.F.R. § 42.6(c) 10

I. INTRODUCTION

Ford's Petition asks the Board to institute review based on a claim scope that Ford itself rejects in the parallel litigation. Before the Board, Ford asserts that the challenged claims should be given their "plain and ordinary meaning" and evaluated against the prior art. Yet in district court, Ford contends that the very same claims are indefinite and fail to inform a person of ordinary skill about the scope of the invention with reasonable certainty. The Director has repeatedly rejected this exact tactic. Petitioners must commit to a consistent claim construction across forums or provide a sufficient explanation for any divergence. Ford does neither.

The Petition is also defective because Ford failed to submit non-patent literature on which its Ground 1 obviousness theory depends. Without it, Ford's ground lacks the evidence required by statute and regulation. And even if the reference had been submitted, Ford has not established that it qualifies as prior art.

Finally, Ford fails to demonstrate a reasonable likelihood of success on the merits. The prior art relied upon in the Petition does not disclose several key limitations of the independent claims, including the claimed perimeter network and the claimed network controller capable of determining whether affected components can be isolated.

Accordingly, the Petition does not satisfy the statutory requirements for institution. Institution should therefore be denied.

II. THE PETITION SHOULD BE DENIED BECAUSE OF FORD'S INCONSISTENT TREATMENT OF INDEFINITENESS.

A. Legal Standard

A petition must identify "[h]ow the challenged claim is to be construed." 37 C.F.R. § 42.104(b)(3). When the Office adopted the *Phillips* claim construction standard for PTAB proceedings, it did so specifically to align PTAB practice with district court litigation and prevent petitioners from advancing inconsistent arguments about claim scope, and instead "choose a single claim construction that best captures the true meaning of the patent claim." *See* Changes to the Claim Construction Standard for Interpreting Claims in Trial Proceedings Before the Patent Trial and Appeal Board, 83 Fed. Reg. 51,340, 51,349–50 (Oct. 11, 2018). The rulemaking further explained that the framework was designed to discourage petitioners from seeking broader constructions at the Board to support patentability challenges and narrower constructions in litigation to avoid infringement. *Id.*

The Director recently enforced those principles in *Revvo Technologies v. Cerebrum Sensor Technologies*. There, the petitioner advanced one claim construction before the PTAB while advocating a different position in district court. The Director held that when a petitioner advances alternative claim construction positions across forums, it must "explain sufficiently why the different positions are warranted." *Revvo Techs. v. Cerebrum Sensor Techs.*, IPR2025-00632, Paper 20 at

4–5 (Director Nov. 3, 2025). Because the petition failed to do so, the Director vacated the Board's institution decision.

The Director confirmed this rule similarly prevents petitioners from adopting indefiniteness positions in parallel litigation while arguing for a different construction, such as plain and ordinary meaning, in the Petition. *Tesla, Inc. v. Intellectual Ventures II LLC*, IPR2025-00340, Paper 18 at 3–4 (Director Nov. 5, 2025) (explaining that allowing otherwise would undermine the Office's goal of "providing greater predictability and certainty in the patent system."); *see also Generac Power Sys., Inc. v. Champion Power Equip., Inc.*, IPR2025-00805, Paper 40 at 4–5 (Director Feb. 3, 2026) (vacating and denying institution where petitioner argued claim terms were indefinite in court while urging the PTAB to treat those same terms as definite).

Taken together, *Revvo*, *Tesla*, and *Generac* establish a straightforward rule. Petitioners must commit in their petitions to the claim scope on which their invalidity challenges depend, and cannot advance different claim constructions in district court unless they have a sufficient explanation. As the Director summarized, petitioners "can't have it both ways and certainly not without a sufficient explanation." *Revvo Techs.*, IPR2025-00632, Paper 36 at 3 (Director Jan. 26, 2026).

B. Ford Attempts to "Have it Both Ways" By Asserting "Plain Meaning" Here and Indefiniteness in Litigation.

In its 37 C.F.R. § 42.104(B)(3) identification, Ford adopted "the plain and ordinary meaning" of the claims, except for the term "and/or". Pet. at 7-8. For that term it adopted Patent Owner's district court construction "[s]ince indefiniteness cannot be raised within an IPR petition." *Id*. But in invalidity contentions it served in the litigation on February 6, 2026, Ford alleged that "the Asserted Claims fail to inform those skilled in the art about the scope of the invention with reasonable certainty, rendering the Asserted Claims (and any claims depending therefrom) invalid as indefinite." Ex. 2026 at 1, 3. Thus, all Challenged Claims are implicated by multiple indefiniteness arguments advanced by Ford in the district court.

These assertions extend to over a dozen claim elements for which Ford relied on plain meaning (or a proposed construction) in the Petition:

(1) "a first security mechanism to enforce a security measure and form a perimeter network logically including the plurality of on board computational components" (claims 1, 9 and 17);

(2) "on board computational component not affected by or potentially affected by the instance of a breach of the security measure" (claims 1, 9 and 17);

(3) "determine whether a computational component affected by the instance of a breach of the security measure can be isolated from at least one on board

computational component not affected by or potentially affected by the instance of a breach of the security measure." (claims 1, 9 and 17);

(4) "isolate" / "isolation" (claims 1, 9 and 17);

(5) "one or more" (claims 1-3, 9-11, and 17-19);

(6) "and/or" (claims 1-2, 7, 9, 15, 17-18 and 23);

(7) "wherein the isolation is one or more of: (1) denying vehicular wireless network access to the computational component affected by the instance of a breach of a security measure, (2) directing communications to and from the computational component affected by the instance of a breach of a security measure to a firewall and/or gateway to enforce a security measure, (3) blocking communications to and from the computational component affected by the instance of a breach of a security measure, and (4) activating a second security mechanism in response to the instance of a breach of a security measure" (claims 1, 9 and 17);

(8) "wherein the security breach instance is one or more of an instance of a virus, malware, unauthorized access, misuse, modification, denial-of-service attack, spoofing, man-in-the-middle attack, ARP poisoning, smurf attack, buffer overflow, heap overflow, format string attack, SQL injection, identity theft (or MAC spoofing), network injection, caffe latte attack, or denial of a computer network and/or network-accessible resource, wherein the network controller receives a warning signal associated with the security breach instance from a gateway, a

firewall, a honeypot, a network node impacted by the security breach instance, and a network probe, and wherein the first security mechanism is one or more of: encryption, checks on MAC addresses, disabling ESSID broadcasting, isolating the vehicular network by a firewall and/or gateway, hiding the SSID (Service Set Identifier), MAC ID filtering, static IP addressing , IEEE 802.11, 802.11i, and/or 802.1x security, use of the wired equivalent privacy encryption, TKIP, EAP, LEAP, PEAP, WPAv 1, and/or WPAv2 protocols, end-to-end encryption, and RF shielding substantially surrounding an interior of the vehicle to attenuate signals and prevent wireless signals from propagating outside the vehicle." (Claim 2);

(9) "wherein at least one of the following is true about the isolation: communications between the at least one on board computational component in a vehicular wireless network not affected by the security breach instance and the computational component affected by the security breach instance, the communications not normally passing through a gateway and/or firewall are redirected through and filtered by the gateway and/or firewall and communications between the at least one on board computational component in a vehicular wireless network not affected by the security breach instance and the computational component affected by the security breach instance are blocked in whole or part." (Claim 7);

(10) "the security breach instance" (claim 10);

(11) "the network controller receives a warning signal associated with the security breach instance from a gateway, a firewall, a honeypot, a network node impacted by the security breach instance, and a network probe," (claims 2, 10 and 18);

(12) "security breach instance is one or more of an instance of a virus, malware, unauthorized access, misuse, modification, denial-of-service attack, spoofing, man-in-the-middle attack, ARP poisoning, smurf attack, buffer overflow, heap overflow, format string attack, SQL injection, identity theft (or MAC spoofing), network injection, caffe latte attack, or denial of a computer network and/or network-accessible resource," (claims 2, 10 and 18);

(13) "the first security mechanism is one or more of: encryption, checks on MAC addresses, disabling ESSID broadcasting, isolating the vehicular network by a firewall and/or gateway, hiding the SSID (Service Set Identifier), MAC ID filtering, static IP addressing , IEEE 802.11, 802.11i, and/or 802.1x security, use of the wired equivalent privacy encryption, TKIP, EAP, LEAP, PEAP, WPAv 1, and/or WPAv2 protocols, end-to-end encryption, and RF shielding substantially surrounding an interior of the vehicle to attenuate signals and prevent wireless signals from propagating outside the vehicle." (claims 2, 10 and 18); and

(14) "wherein the at least one board computational component is one or more of an on-board sensor, processing module, software application, expansion module,

critical device, non- critical device, and cellular upgrade module, and wherein the computational component affected by the security breach instance and the at least one on board computational component are both within a perimeter network of the vehicle." (claims 3, 11 and 19). *Id.* at 1-4.

Ford filed its Petition on the premise that the claims are definite and capable of construction and comparison to prior art. Then, in district court, asserted that every challenged claim contains numerous indefinite elements. That sequence reflects a strategic attempt to advance incompatible positions across forums—precisely the "have it both ways" conduct the Director has rejected. Permitting institution under these circumstances would undermine the Office's goal of harmonizing claim construction across forums and promoting predictability in the patent system. *See Tesla*, at 4.

There is no sufficient explanation for Ford to argue in its Petition that the plain and ordinary meaning applies—meaning that the claims are definite, can be construed under *Phillips*, and can be evaluated against the prior art—but then argue in district court that "the Asserted Claims fail to inform those skilled in the art about the scope of the invention with reasonable certainty." *Id.* at 1, 3.

In related proceedings, Ford has sought to overcome its inconsistency by stating it "stipulates to withdraw all indefiniteness arguments against the [challenged patent] if the PTAB maintains this IPR, *i.e.*, does not vacate institution." IPR2025-

01342, Paper 16 at 2. Even if such a stipulation could overcome the inconsistency, which Patent Owner contests, this proffer would not achieve the requirement to "choose a single claim construction that best captures the true meaning of the patent claim," allowing Ford the opportunity to adopt different constructions for purposes of avoiding infringement in the related proceeding. In view of the inconsistent positions Ford has already taken in the proceedings, this is particularly problematic. For at least this reason, denial of the petition is warranted.

III. THE PETITION IS DEFECTIVE BASED ON AN EVIDENTIARY FAILURE.

Ford's first ground should be dismissed for the additional reason that it cannot show a reasonable likelihood of success without evidence. Ford alleges that claims 1-24 are obvious based on two references: Amirtahmasebi (EX1019) and Bosch (purportedly identified as EX1050). However, the current record does not include an Exhibit 1050.

A. The Petition Fails to Meet Statutory and Regulatory Requirements

It is the Petitioner's burden to set forth its case in the Petition itself. Ford fails to meet this burden with its first ground. "A petition filed under section 311 may be considered only if … the petition identifies, in writing and with particularity, each claim challenged, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim, including … copies of patents and printed publications that the petitioner relies upon in support

of the petition." 35 USC 312(a)(3)(A); *see also* 37 CFR § 42.104(b); 37 CFR § 42.6(c) ("Each exhibit must be filed with the first document in which it is cited except as the Board may otherwise order.").

Ford failed to submit the "Bosch" reference as an Exhibit when it filed its Petition. Ford identifies "Bosch" as an "Automotive Handbook" and refers to it as "EX1050" (Pet. at 13), but there is no record of an Exhibit 1050. Ford's exhibits jump from 1020 to 1051.

Ford relies upon "Bosch" to supply elements Ford acknowledges are missing from its primary reference Amirtahmasebi. Pet. at 14-15. Specifically, Ford alleges that Amirtahmasebi provides "ECU-level security mechanisms, while Bosch provides foundational ECU hardware." *Id.* at 14. Ford also alleges that "[a] PHOSITA would have understood Amirtahmasebi's security logic would be executable on Bosch's architecture." *Id.* at 15. But without evidence of the Bosch disclosure, Ford's motivation to combine is merely conclusory. The same is true for Ford's reliance on "Bosch" for element 1[c]: "a microprocessor executable network controller operable to (i) detect an instance of a breach of the security measure" (Pet. at 24), element 17[b]: "a non-transient, tangible computer readable medium comprising" (Pet. at 57), as well as elements 9[c]: "a microprocessor executable network controller," and 17[c]: "a microprocessor executable network controller on board a selected vehicle that, when executed," (Pet. at 58).

Without "Bosch," Ford's obviousness combination of Amirtahmasebi and Bosch fails. Accordingly, Ford has failed to show a reasonable likelihood of success in proving obviousness of under Ground 1.

B. Ford Failed to Prove "Bosch" is a Printed Publication.

Ford also fails to show that Bosch qualifies as a prior art printed publication. *Inter partes* review may only be based on patents or printed publications. 35 U.S.C. § 311(b). Ford characterizes "Bosch" as an automotive engineering "reference handbook," which would be a printed publication. To qualify as a printed publications, Ford must prove that the reference was publicly accessible before the priority date. *Blue Calypso, LLC v. Groupon, Inc*., 815 F.3d 1331, 1348-49 (Fed. Cir. 2016) (affirming Board's conclusion reference was not printed publication because Petitioner provided no evidence of public accessibility other than its expert's conclusion that the reference was "publicly available around November 2003.") *citing In re Cronyn,* 890 F.2d 1158, 1160 (Fed.Cir.1989). Here, Ford has not done so and cannot do so now.

Public accessibility requires evidence that the reference was "disseminated or otherwise made available to the extent that persons interested and ordinarily skilled in the subject matter or art exercising reasonable diligence, can locate it." *Id.* at 1348. Ford did not provide any such evidence with its Petition. The reference is not in evidence. Ford did not offer a declaration that it was publicly available. And it

did not argue that "Bosch" was publicly accessible within the Petition itself. Instead, Ford declares that "Bosch" was "Published: October 2004" (Pet. at 4) and its expert baldly asserts that "Bosch, Ex. 1050 is a true and accurate copy of a book that ***I understand*** was published by Robert Bosch GmbH in October 2004" (Ex. 1003 at p. 69, fn. 18 (emphasis added)). Thus, Ford lacks evidence sufficient to establish a reasonable likelihood that "Bosch" was publicly accessible before the critical date of the challenged patent. *See Hulu, LLC v. Sound View Innovations, LLC*, IPR2018-01039, Paper 29 at 13 (POP December 20, 2019). Ford cannot cure this deficiency post-petition. *Id.* (explaining that 35 U.S.C. § 312(a) "requires that the petition identify with particularity the grounds for institution and evidence supporting such grounds" including "the prior art relied upon and evidence that it qualifies as such"). For this additional reason, Ford has failed to show a reasonable likelihood of success in proving obviousness under Ground 1.

IV. THE PETITION SHOULD BE DENIED BECAUSE FORD FAILS TO SHOW A REASONABLE LIKELIHOOD OF SUCCESS FOR AT LEAST ONE CHALLENGED CLAIM

Ford's Petition also fails on the merits. Patent Owner is highlighting Ford's most obvious failures below that illustrate Ford has failed to show a reasonable likelihood of success for at least one claim. To the extent Patent Owner does not argue a limitation, Patent Owner is not conceding that such a limitation is disclosed, taught, suggested, or proven.

A. Ford's Ground 1 fails to show that claims 1-24 are obvious over Amirtahmasebi and Bosch

1. Independent claim 1

a. Amirtahmasebi fails to disclose, teach, or suggest limitation 1[b]: a first security mechanism to enforce a security measure and form a perimeter network logically including the plurality of on board computational components a perimeter network

Ford fails to point to anything in Amirtahmasebi that show the formation of a perimeter network as required by claim 1. Rather, Ford spends a page and a half describing a problem that Amirtahmasebi identifies, and then jumps to a solution not disclosed. Pet. at 18-19.

Ford argues that "Amirtahmasebi teaches security methods and solutions that would allow the formation of such a logical 'perimeter network' boundary to protect the ECUs residing within the vehicle." Pet. at 20. Ford points to a firewall mechanism (*id.*) and an Intrusion Detection System (*id.* at 21) in Amirtahmasebi as first security mechanisms that enforce security measures, but does not identify where Amirtahmasebi teaches the claimed perimeter network. *Id.* at 20-22. Instead, Ford argues that a "'*perimeter network'* may be formed to separate a specific ECU, i.e. the Navigation Controller, or multiple ECUs, sensors, or modules from communications with external sources." *Id.* at 19. Ford's expert's declaration fails to fill this gap. *See* Ex. 1003 at 182-202. And neither Ford nor its expert suggest any other art makes this teaching.

Obviousness cannot be established merely by showing that a prior-art reference could be modified to reach the claimed invention. Rather, the petitioner must demonstrate that a person of ordinary skill would have been motivated to make the modification, supported by articulated reasoning and evidence. *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064 (Fed. Cir. 2015) (confirming that "obviousness concerns whether a skilled artisan not only could have made but would have been motivated to make the combinations or modifications of prior art to arrive at the claimed invention."); *Arendi S.A.R.L. v. Apple Inc*., 832 F.3d 1355, 1362 (Fed. Cir. 2016). Reliance on possibilities, especially without supporting evidence or articulated underpinning, is improper and fraught with hindsight. *See InTouch Techs., Inc. v. VGO Commc'ns, Inc*., 751 F.3d 1327, 1352 (Fed. Cir. 2014) (finding expert engaged in hindsight when focusing on what a skilled artisan *could* accomplish).

Amirtahmasebi fails to disclose, teach, or suggest a perimeter network, and Ford has failed to show a reasonable likelihood of success as to claim 1 in Ground 1.

b. Amirtahmasebi fails to disclose, teach, or suggest a microprocessor executable network controller operable to perform elements (i)-(iii)

Claim 1 requires a microprocessor executable network controller operable to (i) detect a security measure breach, (ii) determine whether a component affected by breach can be isolated from another component, and (iii) isolate either the other

component or the affected component via four different options. Amirathmasebi fails to disclose, teach, or suggest such a microprocessor executable network controller. Ford relies upon "Bosch" to supply this feature, thereby admitting Amirtahmasebi fails to disclose, teach, or suggest such a microprocessor executable network controller. Pet. at 14-15, 24, 57-59. And because Ford cannot rely upon "Bosch" for the failures identified above, Ford has failed to show a reasonable likelihood that this element is obvious, and independent claim 1 remains patentable.

2. Independent claims 9 and 17

Independent claims 9 and 17 comprise similar features to those in independent claim 1. Therefore, Ford fails to show a reasonable likelihood of success in proving obviousness of claims 9 and 17 based on Spaur and Piece for reasons similar to those set forth above. Thus, independent claims 9 and 17 remain patentable.

3. Dependent claims 2-8, 10-16, and 18-24

Claims 2-8, 10-16, and 18-24 remain patentable at least by virtue of their dependence on respective patentable independent claims, which as shown above, Ford has failed to show a reasonable likelihood of success of proving obviousness. Therefore, Ford has also failed to show a reasonable likelihood of success of proving obviousness for these claims as well.

B. Ford's Ground 2 fails to show that claims 1, 9, and 17 are obvious over Spaur and Peirce

1. Independent claim 1

a. Spaur in view of Peirce fail to disclose, teach, or suggest limitation 1[d]: determine whether a computational component affected by the instance of a breach of the security measure can be isolated from at least one on board computational component not affected by or potentially affected by the instance of a breach of the security measure, and

Ford's arguments for limitation 1[d] depend on its suggestion that Spaur's bus activity monitoring would lead a PHOSITA to determine whether a computational component affected by the instance of a breach of the security measure can be isolated from at least one on board computational component not affected by or potentially affected by the instance of a breach of the security measure. *Id.* at 68, 71. But Spaur's discussion of "security monitoring" involves the use of a timing limitation whereby the security controller discontinues a secure channel connection "after a predetermined time event." *Ex. 1020* at 42. Spaur does not describe that its timing limitation has anything to do with determining "whether a computational component affected by the instance of a breach of the security measure can be isolated from at least one on board computational component not affected by or potentially affected by the instance of a breach of the security measure." Ford's other argument that "Spaur further states that the security controller 100 authenticates resources, mediates traffic, and provides bus and bandwidth

arbitration" (Pet. at 72), likewise fails to map Spaur's alleged features to the claim language.

Ford does not contend that Peirce teaches limitation 1[d]. Thus, , Ford has failed to show a reasonable likelihood of success of proving obviousness of claim 1 based on Spaur and Peirce.

2. Independent claims 9 and 17

Independent claims 9 and 17 comprise features virtually identical to independent claim 1. Therefore, Ford fails to show a reasonable likelihood of success in proving obviousness of claims 9 and 17 based on Spaur and Peirce for reasons similar to those set forth above.

V. CONCLUSION

For the forgoing reasons, Patent Owner respectfully requests that institution be denied.

Date: March 11, 2026

Respectfully submitted,
AVANTECH LAW, LLP
80 S 8th St, Suite 900
Minneapolis, MN 55402
(312) 487-2185

/Eric A. Zelepugas/
Eric A. Zelepugas
Registration No. 73,302
Lead Counsel for Patent Owner

CERTIFICATE OF COMPLIANCE WITH WORD COUNT

I certify that this paper complies with the type-volume limitations of 37 C.F.R. §42.24(B)(1) because it contains 3,739 words (determined by the word-processing system used to prepare this paper), excluding the parts of the paper exempted by 37 C.F.R. §42.24(a).

Date: March 11, 2026

Respectfully submitted,

/Eric A. Zelepugas/
Eric A. Zelepugas
Registration No. 73,302
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** and was served electronically via e-mail on March 11, 2026, in their entireties on the following counsel of record for Petitioner:

Andrew B. Turner (Lead Counsel)
John P. Rondini (Backup Counsel)
John S. LeRoy (Backup Counsel)
Christopher C. Smith (Backup Counsel)
Francesca M. Cusumano (Backup Counsel)
BROOKS KUSHMAN P.C.
aturner@brookskushman.com
jrondini@brookskushman.com
jleroy@brookskushman.com
csmith@brookskushman.com
fcusumano@brookskushman.com
FPGP0155IPR@brookskushman.com

Date: March 11, 2026

Respectfully submitted,
AVANTECH LAW, LLP
80 S 8th St, Suite 900
Minneapolis, MN 55402
(312) 487-2185

/Eric A. Zelepugas/
Eric A. Zelepugas
Registration No. 73,302
Lead Counsel for Patent Owner