

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DRAFTKINGS INC.,
Petitioner,

v.

WINVIEW IP HOLDINGS, LLC,
Patent Owner.

Case IPR2026-00175
U.S. Patent No. 11,338,189

PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL

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37 C.F.R. § 42.1(b)12, 14

37 C.F.R. §§ 42.10012

77 Fed. Reg. 48,680 (Aug. 14, 2012)12, 14

PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	Complaint for Patent Infringement, <i>WinView IP Holdings, LLC v. DraftKings Inc., et al.</i> , No. 3:25-cv-01143, Dkt. No. 1 (D.N.J.), filed on February 10, 2025
2002	Declaration of David Lockton in Support of Patent Owner's Request for Discretionary Denial
2003	BettingUSA.com webpage, "WinView Games Review (Closed)", available at https://www.bettingusa.com/fantasy/reviews/winview-games/ , dated March 20, 2026
2004	MediaVillage.com webpage, "WinView Play-Along App Synchronizes with Live TV Sports," by J.P. Fields, available at https://www.mediavillage.com/article/winview-play-along-app-synchronizes-with-live-tv-sports/ , dated February 2, 2017
2005	Second Amended Complaint for Patent Infringement, <i>WinView IP Holdings, LLC v. DraftKings Inc., et al.</i> , No. 21-cv-13405, Dkt. No. 26 (D.N.J.), filed on November 15, 2021
2006	Letter from counsel for Petitioner to Honorable Judge Castner, <i>WinView IP Holdings, LLC v. DraftKings Inc., et al.</i> , No. 3:25-cv-01143, Dkt. No. 56 (D.N.J.), filed on January 20, 2026
2007	Text Order Staying Motion to Dismiss, <i>WinView IP Holdings, LLC v. DraftKings Inc., et al.</i> , No. 3:25-cv-01143, Dkt. No. 58 (D.N.J.), filed on January 21, 2026
2008	Text Order Regarding Mr. Lockton's Deposition, <i>WinView IP Holdings, LLC v. DraftKings Inc., et al.</i> , No. 3:25-cv-01143, Dkt. No. 63 (D.N.J.), filed on March 13, 2026
2009	Complaint for Patent Infringement, <i>WinView IP Holdings, LLC v. FanDuel, Inc., et al.</i> , No. 3:25-cv-01146, Dkt. No. 1 (D.N.J.), filed on February 10, 2025

I. INTRODUCTION

WinView IP Holdings, LLC (“WinView”) respectfully requests that the Director exercise his discretion under 35 U.S.C. § 314(a) to deny institution. A holistic review of the circumstances—including DraftKings’ long-standing knowledge of the patent family, its years-long delay in seeking review, its strategic manipulation of parallel district-court proceedings, and its fragmented, estoppel-avoiding petition strategy—shows that this IPR is not the efficient, streamlined alternative to litigation envisioned by the AIA. Rather, it is an attempt to leverage PTAB resources as a tactical delay mechanism while litigating overlapping validity issues elsewhere.

WinView reached out to DraftKings seven years ago to negotiate a partnership or patent license. After DraftKings signed an NDA with WinView, it conducted diligence into its patents. WinView provided DraftKings with full disclosures of its patent holdings, including the parent of U.S. Patent No. 11,338,189 (Ex. 1001, “the ’189”) Patent and related patents. When DraftKings ultimately declined to partner with WinView or take a license to its patents, WinView put DraftKings on notice that it would enforce its patents, filing a first suit in 2021. WinView then filed a second suit in 2025 to assert patents that issued after it filed the first suit. Despite having known about WinView’s patents for seven years, DraftKings waited more

than eleven months after WinView asserted the '189 Patent against it to file this Petition.

Under recent Director guidance and decisions, petitioners like DraftKings who have long been on notice of a patent family's technology, disclosures, and significance cannot wait until the final days of the statutory deadline to seek *inter partes* review. DraftKings' delay weighs heavily in favor of discretionary denial.

Institution would also undermine efficiency. To evade the consequences of IPR estoppel, DraftKings fragmented its challenges across related families and coordinated with FanDuel, the defendant in another case filed by WinView asserting the same patents, to distribute petitions while leaving large portions of asserted claims—and entire asserted patents—unaddressed. Because the parties are already litigating the validity of the '189 Patent parent in the District Court, institution would not simplify the broader dispute; it would multiply proceedings and create the very piecemeal, duplicative litigation the AIA sought to prevent. Indeed, DraftKings' *Sotera* stipulation preserves avenues for parallel invalidity attacks, confirming that this Petition was not intended as a true alternative to district-court litigation.

DraftKings' conduct before the District Court confirms these concerns. After filing this Petition near the end of the statutory window, DraftKings urged the court to delay ruling on fully-briefed motions to dismiss and sought to halt discovery—including to efforts to block testimony from the 89-year-old inventor, who is in

declining health—while shifting only a minor subset of the validity issues to be addressed in the District to this forum. The District Court has since rejected DraftKings' attempt to block the preservation of the inventor's testimony as not "at all persuasive," underscoring DraftKings' gamesmanship.

For these reasons, and consistent with the Director's focus on settled expectations, fairness, and efficient use of PTAB resources, institution should be denied.

II. ARGUMENT

A. Strong Settled Expectations Favor Discretionary Denial

The parties' settled expectations overwhelmingly favor discretionary denial. For seven years before DraftKings filed this Petition, it had direct, detailed, and repeated notice of the patent family from which the '189 Patent issued and of its relevance to DraftKings' own products. That longstanding awareness, combined with DraftKings' decision to wait until the final days of its statutory deadline, strongly supports denial. Ex. 2001 (Complaint) ¶¶ 122-128.

1. WinView's Direct Notice to DraftKings of the '189 Patent Family Creates Strong Settled Expectations

WinView informed DraftKings about the WinView patent portfolio—including the family that produced the '189 Patent—in early 2019, giving rise to strong settled expectations between the parties. *See, e.g., Amazon.com, Inc. v. Audio Pod IP, LLC*, No. IPR2025-00768, Paper 15 at 2-3 (P.T.A.B. Aug. 14, 2025)

(discretionarily denying IPR of patent issued less than 5 years old where petitioner previously knew of patent portfolio and earlier related patent, and where the district court will be considering the validity of other asserted patents separately from the younger patent “would be an inefficient use of the Board resources”).

WinView and DraftKings commenced discussions regarding a potential business relationship involving WinView's technology in January 2019. Ex. 2002 (Lockton Decl.), ¶ 6. During those discussions, DraftKings executed an NDA to evaluate a potential transaction and conduct diligence into WinView, including its patent portfolio. Ex. 2001 (Complaint), ¶¶ 123-124; Ex. 2002 (Lockton Decl.) at ¶ 6. DraftKings expressly acknowledged that WinView was not waiving its patent enforcement rights. Ex. 2001 (Complaint), ¶124. DraftKings then specifically requested information regarding WinView's patents, and WinView provided disclosures identifying its patent portfolio, including the technology underlying the '189 Patent and its parent patents and applications. Ex. 2001 (Complaint), ¶¶ 120, 122-128; Ex. 2002 (Lockton Decl.), ¶¶ 6-7.

WinView then provided DraftKings with detailed disclosures identifying WinView's patent portfolio, including an intellectual property Status Report that specifically identified the '189 Patent's direct priority patent and other ancestral patents in the same family. Ex. 2002 (Lockton Decl.), ¶ 7; Ex. 2001 (Complaint),

¶128.¹ WinView further established a secure data room for DraftKings on March 8, 2019, containing confidential presentations, operational information, and detailed explanations of WinView's patented and patent-pending technology. Ex. 2001 (Complaint), ¶ 127; Ex. 2002 (Lockton Decl.), ¶ 7. Thus, DraftKings was unmistakably on notice of the '189 Patent's family for years.

After concluding diligence, DraftKings declined to partner with WinView or take a license to its patents. Ex. 2001 (Complaint), ¶ 130; Ex. 2002 (Lockton Decl.), ¶ 6. DraftKings continued operating its gaming platforms WinView now accuses of infringement without obtaining a license. Ex. 2001, ¶ 131.

WinView filed suit against DraftKings in 2021, asserting four patents, including the '189 Patent's parent, U.S. Patent No. 10,806,988 (the "'988 Patent"), which issued approximately five and a half years ago (on October 20, 2020), and identified U.S. Patent No. 8,002,618, which issued more than fourteen years ago

¹ WinView disclosed the '189 Patent's parent, U.S. Patent No. 8,002,618, which issued more than fourteen years ago (August 23, 2011), U.S. Patent No. 8,622,798, issued twelve years ago (January 7, 2014), U.S. Patent No. 9,056,251, issued more than ten years ago (June 16, 2015), U.S. Patent No. 9,652,937, issued nearly nine years ago (May 16, 2017), and U.S. Patent No. 10,186,116, issued seven years ago (January 22, 2019). Ex. 2002 (Lockton Decl.), ¶ 7.

(August 23, 2011) and to which the '189 Patent claims priority. *WinView IP Holdings, LLC v. DraftKings Inc.*, No. 3:21-cv-13405 (D.N.J.) (“*WinView I*”). *See, e.g.*, Ex. 2005 (*WinView I* Second Amended Complaint), ¶¶ 39-40. That litigation provided DraftKings with further notice of the '189 Patent's family and its relevance to DraftKings' products.

Additional public disclosures reinforce DraftKings' notice. WinView publicly identified its patent portfolio on its website by December 2015 and continued to update those disclosures as patents issued. Ex. 2001 (Complaint) ¶¶ 118-119. DraftKings therefore had both actual and constructive notice of the relevant patent family for years before filing the present Petition.

These facts mirror those supporting discretionary denial in *Neural AI, Murata*, and *iRhythm*, where actual notice—whether through commercial relationships, portfolio presentations, or ongoing discussions—was instrumental in finding strong settled expectations and denying institution. *See NVIDIA Corp. v. Neural AI, LLC*, No. IPR2025-00608, Paper 16 at 2-3 (P.T.A.B. July 31, 2025) (denying institution where petitioner had a prior commercial relationship with the original patent owner, received a presentation discussing the patent portfolio, had actual notice of the relevant patents, and failed to seek early review); *Murata Mfg. Co. v. Georgia Tech Rsch. Corp.*, No. IPR2025-00383, Paper 14 at 2-3 (P.T.A.B. July 29, 2025) (petitioner's discussions with patent owner regarding the relevant technology, and

its resulting awareness of patent owner's work in that space for a significant amount of time before filing, supported denial because petitioner's failure to seek early review outweighed other considerations); *iRhythm Techs., Inc. v. Welch Allyn Inc.*, No. IPR2025-00363, Paper 10 at 3 (P.T.A.B. June 6, 2025) ("Petitioner's awareness of Patent Owner's applications and failure to seek early review of the patents favors denial and outweighs the [other]-discussed considerations.").

DraftKings cannot claim surprise or lack of awareness to excuse its late action. The USPTO published the '189 Patent application five years ago (January 7, 2021), issued it nearly four years ago (May 24, 2022), and it claims priority, through a chain of continuation applications to WinView's January 10, 2006 provisional application. Ex. 1001 at (60), (65). Accordingly, the length of time the '189 Patent family members were published, Petitioner's knowledge of WinView and WinView's patents create settled expectations that the Office should not disturb. *See, e.g., Amazon.com, Inc.*, No. IPR2025-00768, Paper 15 at 2-3 (discretionarily denying IPR of patent issued less than 5 years old where petitioner previously knew of patent portfolio and earlier related patent, and where it the district court will be considering the validity of other asserted patents separately from the younger patent "would be an inefficient use of the Board resources").

Like in *Amazon*, the '189 Patent is related to a series of patents which were issued between 7 and 14 years ago and which WinView disclosed to DraftKings under an NDA. *Id.*; Ex. 2001 (Complaint) ¶¶ 122-128; Ex. 1001 at (60), (63); Ex. 2002 (Lockton Decl.), ¶ 7. In addition, the '189 Patent's parent—the '988 Patent—is actively being litigated in *WinView I*. These patents share the same specification and overlapping inventive concepts. As a result, the District Court is already adjudicating closely related issues. Thus, the '189 Patent arose from a mature and publicly visible patent family, DraftKings had direct notice of that family years before filing this Petition, and “considering the validity” of its parent patent in District Court while instituting review of the '189 Patent would be “an inefficient use of Board resources and tips the balance to discretionary denial as to that patent too.” *Amazon.com, Inc.*, No. IPR2025-00768, Paper 15 at 3.

Neural AI is also instructive and supports denial of institution. No. IPR2025-00608, Paper 16 at 2-3 (denying institution because prior relationship, portfolio presentation, actual notice, and delay tipped the balance toward denial). There, the Director denied institution as to a patent that reissued in 2023 with different claims from the original patent. The Director expressly recognized that, “[w]hile ordinarily such circumstances would counsel against discretionary denial,” denial was still warranted because the petitioner and the original patent owner had a commercial relationship, the patent owner had sent the petitioner a presentation discussing its

patent portfolio, including the original patent from which the reissue issued, and petitioner therefore had actual notice yet failed to seek early review. *Id.*

As in *Neural AI*, DraftKings had a prior commercial relationship with Patent Owner, received detailed information regarding Patent Owner's portfolio and underlying technology, and had direct notice of the family from which the challenged patent issued well before filing its Petition. And, as in *Neural AI*, DraftKings nevertheless delayed seeking review. *Neural AI* thus directly supports denial here: even though the challenged claims had not been issued at the time petitioner gained the knowledge, settled expectations still favor denial when the petitioner had earlier actual notice through direct interactions concerning the portfolio and failed to act. *See* No. IPR2025-00608, Paper 16 at 2-3.

Despite this extensive notice, DraftKings waited years—through confidential diligence, public disclosures, patent issuance, and litigation involving the same family—before seeking review. That delay weighs in favor of discretionary denial. *See Neural AI*, Paper 16 at 2-3 (denying institution of a reissue patent that reissued in 2023 with different claims from the original patent where petitioner had actual notice through a prior commercial relationship and portfolio presentation, yet failed to seek early review); *iRhythm*, Paper 10 at 3 (finding that awareness of Patent Owner's applications and failure to seek early review favored denial).

Under these circumstances, the parties' settled expectations favor denying institution.

III. JUDICIAL ECONOMY, SYSTEM EFFICIENCY, AND FAIRNESS FAVOR DISCRETIONARY DENIAL

Institution should also be denied under 35 U.S.C. § 314(a) because proceeding with this IPR would undermine judicial economy, create inefficiencies, increase the risk of inconsistent decisions, and reward litigation gamesmanship. A holistic review of the circumstances—including DraftKings' delayed filing, its strategic manipulation of the District Court schedule, and its fragmented petitioning strategy—confirms that this IPR would not operate as a true alternative to litigation and would instead multiply proceedings and increase burdens on the Board and District Court.

A. Petitioner Strategically Delayed Review While Attempting to Stall the District Court Action and Block the Preservation of Key Evidence

Petitioner's conduct reflects a deliberate procedural strategy to multiply proceedings, delay adjudication of the merits, and block the preservation of critical testimony. WinView filed its complaint in *WinView II* in 2025. Six months later, DraftKings moved to dismiss the case. The parties completed briefing on that motion, but before the court issued a ruling, DraftKings filed the present IPR petitions. DraftKings waited until nearly the end of the one-year statutory period

before filing. *See* Pet. at 2 (filing on January 16, 2026, and noting that: “The earliest date of service on Petitioner in the co-pending litigation was February 10, 2025.”).

DraftKings then notified the District Court that it had filed the present IPR petitions and intimated that additional petitions would follow.² *See* Ex. 2006 at 2 (“DraftKings further notes that the deadline for DraftKings or FanDuel, Inc. . . . to file additional IPR petitions relating to the patents-in-suit has not yet elapsed.”). Shortly thereafter, the court stayed DraftKings’ motion to dismiss. Ex. 2007.

Worse, as DraftKings continued its efforts to obstruct resolution of the parties’ disputes, it simultaneously opposed efforts to preserve critical inventor testimony. David Lockton, WinView’s President, founder, and the primary inventor of the asserted patents, will soon turn 89, and he was recently diagnosed with a severe health issue. *See* Ex. 2008 (order granting WinView’s request to take the *de bene esse* deposition of a witness “who’s age and health conditions may affect his availability for trial”). Considering the substantial risk that key testimony could be lost if it is not preserved promptly, WinView sought leave to take a *de bene esse* deposition of Mr. Lockton, its founder and the primary inventor of its asserted patents. DraftKings opposed that request, but the District Court rejected its

² No further petitions followed.

arguments, holding that DraftKings “offer a number of responses as to why the deposition should not proceed at this time. None are at all persuasive.” Ex. 2008.

DraftKings’ decision to delay the District Court action while shifting only a minor subset of the issues to be determined to the Board for determination directly contravenes Congress’ intent to create “a more efficient and streamlined patent system that will improve patent quality and limit unnecessary and counterproductive litigation costs.” Changes to Implement Inter Partes Review Proceedings, 77 Fed. Reg. 48,680 (Aug. 14, 2012) (codified at 37 C.F.R. §§ 42.100 et seq.). It also conflicts with the Board’s goal of “secur[ing] the just, speedy, and inexpensive resolution of every proceeding” because it all but guarantees serial consideration of substantially similar issues across multiple forums. 37 C.F.R. § 42.1(b). These problems, which are all of Petitioner’s making, promise to leave the parties’ broader dispute unresolved for years to come.

The Board has denied institution even where a parallel district court case was stayed, confirming that a stay does not outweigh other considerations such as delay and inefficiency or strong settled expectations. *See Amazon.com, Inc. v. SoundClear Techs. LLC*, No. IPR2025-01080, Paper 15 at 2-3 (P.T.A.B. Oct. 17, 2025) (denying institution despite a stay in the parallel district court proceeding); *Kahoot! AS v. Interstellar Inc.*, No. IPR2025-00696, Paper 12 at 2-3 (P.T.A.B. July 31, 2025) (same). Notably, DraftKings refuses to participate in discovery until the motions to

dismiss are decided, which it has now asked the District Court to postpone resolving for at least four months (in the event institution is denied) and sixteen months (if institution is granted).

Allowing institution under these circumstances would reward a litigation strategy that delays adjudication while placing the integrity of the evidentiary record at risk. These considerations weigh strongly against institution.

B. Institution Would Not Simplify the Dispute and Undermines Efficiency Through Fragmented, Piecemeal Challenges

Institution would not promote judicial economy or system efficiency. Instead, it would create duplicative proceedings, fragment validity issues across forums, and allow DraftKings to evade estoppel through coordinated, selective challenges.

First, DraftKings structured the petitions to fragment, rather than streamline, Petitioners' challenges.³ WinView is asserting patents from three families against DraftKings and FanDuel. Ex. 2001 (Complaint), ¶¶ 5, 32-40; Ex. 2009 (FanDuel's Complaint), ¶¶ 5, 23-31. In *WinView II*, DraftKings filed petitions challenging the '883 and '189 Patents, while FanDuel filed a petition directed to the '349 Patent.

³ The petitions arise in the context of coordinated litigation involving the same patents. In the District Court actions, WinView asserted nine patents across three related patent families against the DraftKings and FanDuel defendant groups.

FanDuel, Inc. v. Winview IP Holdings LLC, No. IPR2026-00245, Paper 2 (P.T.A.B. Feb. 3, 2026). Collectively, the petitions target one patent from each asserted family, and the parties coordinated to the extent that the petitions balanced out and covered the three families of WinView's asserted patents. This structure allows Petitioners to mount a coordinated, portfolio-spanning attack while limiting the estoppel consequences that would attach if a single petitioner challenged all patents. By distributing petitions across multiple defendants and limiting each to selected patents, each petitioner incurs estoppel only for its own filing, leaving the other defendant group free to pursue additional invalidity theories against the same patent in District Court.

This type of piecemeal approach is fundamentally inconsistent with the purpose of *inter partes* review, which was designed to provide a streamlined alternative to litigation—not to an additional layer of fragmented, overlapping proceedings, and DraftKings and FanDuel have crafted. *See* 77 Fed. Reg. 48,680 (establishing a system to “limit unnecessary and counterproductive litigation costs”); 37 C.F.R. § 42.1(b) (proceedings must secure “the just, speedy, and inexpensive resolution” of disputes).

Second, the '189 Patent is part of a broader set of asserted patents across related families, and its parent—the '988 Patent—is actively being litigated in *WinView I*. These patents share the same specification and overlapping inventive

concepts. As a result, the District Court is already adjudicating closely related issues. Instituting review here would not resolve those issues, it would create parallel proceedings addressing overlapping validity questions in different tribunals. *See Apple Inc. v. HBCU Messaging US LP*, No. IPR2025-01493, Paper 15 at 1 n.2 (P.T.A.B. Feb. 18, 2026) (recognizing inefficient use of Office resources when similar issues involving related patents are addressed in district court).

Third, DraftKing's Petition does not meaningfully simplify the dispute with respect to the '189 Patent itself. DraftKings challenges only 16 of the 38 asserted claims. Thus, even if the Board were to institute review and ultimately invalidate every challenged claim, a substantial portion of the asserted claims would remain unaddressed. The Petition therefore cannot resolve the validity of the '189 Patent and would leave significant issues for adjudication outside this proceeding when the District Court case resumes.

Fourth, DraftKings' *Sotera* stipulation (Ex. 1019) does not cure these inefficiencies or ensure that this proceeding would be a true alternative to the District Court litigation. *Motorola Sols., Inc. v. Stellar, LLC*, No. IPR2024-01205, Paper 19 at 3-4 (P.T.A.B. Mar. 28, 2025) (vacating institution where the stipulation "does not ensure that these IPR proceedings would be a 'true alternative' to the district court proceeding"). DraftKings' stipulation applies only to the '189 patent and only forecloses assertion in District Court of invalidity grounds based on prior art patents

or printed publications that were raised or reasonably could have been raised in this IPR. The Board has made clear that a *Sotera* stipulation does not automatically render an IPR an efficient alternative. *See Sotera Wireless, Inc. v. Masimo Corp.*, No. IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to § II.A) (stipulation considered, but not determinative). Thus, the Board has denied institution where a stipulation “does not eliminate[] the inefficiencies” created by overlapping invalidity theories. *Shenzhen Tuozhu Tech. Co. v. Stratasys, Inc.*, No. IPR2025-00354, Paper 11 at 2-3 (P.T.A.B. June 12, 2025).

DraftKings bears the burden on discretionary denial factors, including demonstrating that its stipulation meaningfully eliminates overlap, and cannot meet that burden here. *See Apple Inc. v. Fintiv, Inc.*, No. IPR2020-00019, Paper 11 at 12-13 (P.T.A.B. Mar. 20, 2020). Nothing prevents DraftKings from asserting the same prior art against other family members in the District Court, such as U.S. Patent Nos. 11,951,402 and 11,918,880 asserted in *WinView II*, and the '988 patent litigated in *WinView I*. Because the same invalidity issues will be litigated regardless of institution, Board review would duplicate effort and risk inconsistency. *See SAP Am., Inc. v. Cyandia, Inc.*, No. IPR2024-01495, Paper 13 at 8-9 (P.T.A.B. Apr. 7, 2025) (“Although Petitioner has filed a *Sotera* stipulation, we agree with Patent Owner that the stipulation has limited practical effect in reducing the overlapping efforts here and in the Litigation.”).

DraftKings' stipulation also permits reliance on system art in combination with petition art and allows the continued pursuit of overlapping invalidity theories in District Court. *See id.* at 9 (“Because Petitioner cannot challenge claims in this proceeding based on a public use or sale of the [] system, Petitioner’s *Sotera* stipulation would not prevent Petitioner from asserting an invalidity defense in the district court based on the public use or sale of the [] system.”). It also does nothing to address coordinated challenges by Petitioners. *See Formcon AG v. Regeneron Pharms., Inc.*, No. IPR2025-00233, Paper 15 at 19 (P.T.A.B. June 2, 2025) (finding that the stipulation would not “effectively mitigate” concerns of overlap because other “defendants who are similarly motivated to try to invalidate the [] patent claims, [] are not subject to any *Sotera* stipulation.”).

Taken together, these facts demonstrate that institution would not simplify the parties' dispute, but would instead multiply proceedings, fragment issues, and undermine the efficiency goals of the inter partes review system.

IV. CONCLUSION

For all of these reasons, WinView accordingly requests that the Board deny institution of *inter partes* review of the Challenged Claims of the '189 Patent.

Patent Owner's Request for Discretionary Denial
IPR2026-00175 (U.S. Patent No. 11,338,189)

Respectfully submitted,

Date: March 23, 2026

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on Petitioner as detailed below.

<i>Date of service</i>	March 23, 2026
<i>Manner of service</i>	Electronic Mail (john.nobgood@wilmerhale.com; zach.nemtzw@wilmerhale.com; akkad.moussa@wilmerhale.com; trishan.esram@wilmerhale.com)
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