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January 20, 2026

Via ECF

Honorable Georgette Castner, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *WinView IP Holdings, LLC v. DraftKings Inc., et al.*, No. 3:25-cv-01143-GC-JTQ

Dear Judge Castner:

Our Firm, together with our co-counsel, Wilmer Cutler Pickering Hale and Dorr LLP, represent Defendants DraftKings Inc., DK Crown Holdings, Inc., Crown Gaming Inc., (collectively “DraftKings”), in the above referenced matter.

We write to notify the Court that, on January 16, 2026, DraftKings filed petitions for *inter partes* review (“IPR”) under 35 U.S.C. § 312 and 37 C.F.R. § 42.104 for U.S. Patent No. 11,451,883 (the “’883 patent”) and U.S. Patent No. 11,338,189 (the “’189 patent”), which are two of the nine patents at issue in this Action.¹ The IPRs ask the United States Patent and Trademark Office Patent Trials and Appeals Board (“PTAB”) to review certain claims of the ’883 patent and the ’189 patent and to cancel those claims as invalid as anticipated and/or obvious over the prior art. The ’189 patent is closely related to two other asserted patents in this Action (U.S. Patent Nos. 11,918,880 and 11,951,402) and one of the remaining patents at issue in *WinView I* (U.S. Patent No. 10,806,988), which are in the same family and share overlapping specifications with the ’189

¹ DraftKings filed a similar petition with respect to one of the patents at issue in *WinView Inc. v. DraftKings Inc.* Civil Action No. 21-13405(GC)(JTQ) (“*WinView I*”). See D.E. 40. As a result of the submission of a joint status report requested by the Court in *WinView I*, the Court stayed DraftKings’ then-pending motion to dismiss as well as the action “pending the final resolution of all inter partes review (“IPR”) petitions through the final written decision.” See D.E. 46. The IPR resulted in the cancellation of all claims DraftKings had challenged as invalid.

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patent. The '883 patent is closely related to U.S. Patent No. 10,721,543 (“the '543 patent”) asserted in *WinView I*, and the PTAB invalidated all challenged claims of the '543 patent in a prior IPR.

DraftKings brings these concurrent PTAB proceedings to the attention of the Court because the institution and outcome of the two petitions filed by DraftKings could impact this Action, as well as both patents remaining at issue in *WinView I*. DraftKings further notes that the deadline for DraftKings or FanDuel, Inc. (which has been sued for infringement of the same patents in Civil Action No. 25-01146(GC)(JTQ)) to file additional IPR petitions relating to the patents-in-suit has not yet elapsed.

Thank you for your attention to and consideration of this matter.

We are available at the Court’s convenience should Your Honor have any questions or wish to discuss the foregoing.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.

/s/ Melissa E. Flax

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MEF

Cc: All Counsel of Record (via ECF)