UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CAMBRIDGE MOBILE TELEMATICS, INC.,
Petitioner,

v.

SFARA, INC.,
Patent Owner.

IPR2024-00952
Patent 8,989,952 B2

Before JOHN F. HORVATH, ROBERT L. KINDER, and BRENT M. DOUGAL, *Administrative Patent Judges*.

Opinion for the Board filed by DOUGAL, *Administrative Patent Judge*.

Opinion Concurring filed by HORVATH, *Administrative Patent Judge*.

DECISION
Denying Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

A. Background and Summary

Cambridge Mobile Telematics, Inc. ("Petitioner") filed a Petition requesting *inter partes* review of claims 1–18 ("challenged claims") of U.S. Patent No. 8,989,952 B2 ("the '952 patent," Ex. 1001). Paper 2 ("Pet."). Sfara, Inc. ("Patent Owner") filed a Preliminary Response to the Petition. Paper 8 ("Prelim. Resp."). With our authorization, Petitioner filed a Reply (Paper 9, "Prelim. Reply") and Patent Owner filed a Sur-reply (Paper 11, "Prelim. Sur-reply").

For the reasons discussed below, we determine that it is appropriate to exercise our discretion under § 314(a) to deny the Petition.

B. Related Proceedings

Both parties identify the following related district court litigation: *Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, No. 3:23-cv-01368 (D.N.J.). Pet. 88; Paper 6, 1.

C. The '952 Patent

The '952 patent is titled "System and Method for Detecting Vehicle Crash" and "provides an improved method and apparatus of determining, via a communication device, whether a vehicle has crashed." Ex. 1001, codes (54), (57), 2:57–60. The '952 patent explains that "[c]onventional communication devices may detect a vehicle crash by way of monitoring a single parameter," but "such a conventional system may . . . result[] in a false-positive." *Id.* at 3:55–4:26.

The '952 patent sought to decrease the likelihood of obtaining such false positives by first having the communication device "determine[] whether it is located in a vehicle." *Id.* at 4:32–35. This in-vehicle determination can be made "by any known method, non-limiting examples

of which include detecting parameters and comparing the detected parameters with those associated with [a] vehicle." *Id.* at 7:38–41. For example, the '952 patent explains that velocity, acceleration, and sound can be used to determine whether the device is in a vehicle. *Id.* at 7:41–62.

The '952 patent further explains that the device may use two detected parameters to determine whether a crash has occurred. *Id.* at 3:35–40. For example, "non-limiting examples . . . include velocity, acceleration, geodetic position, sound, temperature, vibrations, pressure, contents of surrounding atmosphere and combinations thereof." *Id.* at 6:51–58. The patent states that "[t]he detection of at least two parameters further decreases the number of false-positive vehicle crash detections." *Id.* at 4:41–42.

D. Illustrative Claim

Of the challenged claims, 1, 7, and 13 are independent. Claim 1, reproduced below, is illustrative.

> 1. A device for use with a vehicle, said device comprising:
>
> a mode-determining component operable to detect whether the device is in the vehicle and to generate an in-vehicle signal;
>
> a first detecting component operable [to] detect a first parameter and to generate a first detector signal based on the first detected parameter; and
>
> a second detecting component operable [to] detect a second parameter and to generate a second detector signal based on the second detected parameter;
>
> wherein said mode-determining component is further operable to generate a crash mode signal based on the in-vehicle signal, the first detector signal and the second detector signal.

Ex. 1001, 16:64–17:10.

The method of claim 7 is similar in scope to claim 1. *Id.* at 17:54–18:3. The "non-transitory, computer-readable media" of claim 13 includes features substantially similar to claim 1, and also includes "operating an

operating component in a first mode" and "switching operation of the operating component from the first mode to a second mode based on the crash mode signal." *Id.* at 18:45–67.

Petitioner treats claims 7 and 13's "detecting" and "generating" via a "mode determining component" the same as claim 1's "mode-determining component operable to detect whether the device is in the vehicle and to generate an in-vehicle signal." *See* Pet. 15, 36, 38. Likewise, Petitioner equates the "detecting" and "generating" via a "[first/second] detecting component" of claims 7 and 13 as having the same scope as claim 1's "a first[/second] detecting component operable [to] detect a first[/second] parameter and to generate a first[/second] detector signal based on the first[/second] detected parameter." *Id.* at 20, 36, 38.

E. Evidence

Petitioner relies on the following references:

Name	Reference	Exhibit(s)
Green	US 9,390,625 B2 (July 12, 2016)	1005
Wright	US 9,311,271 B2 (Apr. 12, 2016)	1004

Petitioner also relies on the declaration of Lin Zhong, Ph.D. (Ex. 1002) in support of its arguments.

F. Asserted Grounds of Unpatentability

Petitioner asserts that the challenged claims are unpatentable on the following grounds:

Claim(s) Challenged	35 U.S.C. §	Reference(s)/Basis
1–18	103	Green
1–18	103	Wright, Green

II. ANALYSIS

A. Principle of Law

Petitioner bears the burden of persuasion to prove unpatentability of the claims challenged in the Petition. *Dynamic Drinkware, LLC v. Nat'l Graphics, Inc.*, 800 F.3d 1375, 1378 (Fed. Cir. 2015). A "petition must set forth," *inter alia*, "a statement of the precise relief requested for each claim challenged," identifying "[t]he specific statutory grounds," and "[h]ow the challenged claim is be construed." 37 C.F.R. § 42.104.

B. Claim Construction and 37 C.F.R. § 42.104(b)(3)

We apply the same claim construction standard used in district court actions under 35 U.S.C. § 282(b), including construing the claim in accordance with the ordinary and customary meaning of such claim as understood by one of ordinary skill in the art and the prosecution history pertaining to the patent. 37 C.F.R. § 42.100(b). Our rules also require that a petition set forth "[h]ow the challenged claim is to be construed" as follows:

> Where the claim to be construed contains a means-plus-function . . . limitation as permitted under 35 U.S.C. 112(f), the construction of the claim must identify the specific portions of

> the specification that describe the structure, material, or acts corresponding to each claimed function.

37 C.F.R. § 42.104(b)(3). As the Board recently explained:

> The Consolidated Trial Practice Guide[1,2] ("CTPG") . . . instructs that "[w]here claim language *may* be construed according to 35 U.S.C. § 112(f), a petitioner *must* provide a construction." CTPG 45 (emphases added) (citing 37 C.F.R. § 42.104(b)(3)). The CTPG advises that a party "may choose to elaborate why § 112(f) should or should not apply to the limitation at issue." *Id.* Notably, the CTPG warns that "[a] petitioner who chooses not to address construction under § 112(f) risks failing to satisfy the requirement of 37 C.F.R. § 42.104(b)(3)." *Id.*

10x Genomics, Inc. v. Pres. and Fellows of Harvard Coll., IPR2023-01299, Paper 15 at 2, 8 (PTAB Mar. 14, 2024) (denying institution under 37 C.F.R. § 42.104(b)(3)).

In the district court litigation, Petitioner's position is that "the 'component' terms[3] in the Challenged Claims should be means-plus-function terms governed by §112(f) and that such terms are indefinite for failure to identify corresponding structure to perform the recited functions." Pet. 7 n.3 (citing Ex. 1008, 9–16, 21–23, 26–37). Petitioner explains that Patent Owner's position, in the litigation, is "that Petitioner infringes the '952 patent according to the plain and ordinary meaning of the 'component' terms." *Id.*

---

[1] Available at https://www.uspto.gov/TrialPracticeGuideConsolidated.

[2] Though not part of our rules in 37 C.F.R., the CTPG "is intended to advise the public on the general framework of the rules, including the structure and times for taking action in each of the AIA proceedings" and to "encourage[] consistency of procedures among panels of the Board." CTPG, 1, 3.

[3] For example, in claim 1, the terms "a mode-determining component . . .," "a first detecting component . . .," and "a second detecting component . . .."

In this proceeding, Petitioner argues that "[t]he Board need not expressly construe any term" and that "Petitioner applies the plain and ordinary meaning to the claim terms" consistent with Patent Owner's litigation position. *Id.* at 6–7. Thus, Petitioner does not provide any express construction of the "component" terms, based on means-plus-function, or otherwise.

Patent Owner responds that, though it "proposed a 'plain and ordinary meaning' construction of the "component" terms in the litigation, [it] has also provided its own means-plus-function construction as an alternative. Prelim. Resp. 12 (citing Ex. 1008, 9–37). Patent Owner argues that Petitioner should have addressed whether the "component" terms are means-plus-function limitations and that Petitioner's failure to do so renders the Petition deficient under 37 C.F.R. § 42.104(b)(3). *Id.* at 10. Thus, Patent Owner argues, institution should be denied. *Id.* (citing *Orthopediatrics Corp. v. K2M, Inc.*, IPR2018-01546, Paper 10 (PTAB Feb. 14, 2019) (denying institution under 37 C.F.R. § 42.104(b)(3)); *10x Genomics, Inc.*, IPR2023-01299, Paper 15). We agree.

In the litigation, Petitioner emphasized the importance of resolving whether the "component" terms are means-plus-function terms, stating:

> construction of the listed "component" terms—specifically, **whether those terms are means-plus-function limitations** governed by 35 U.S.C. § 112(f), and if so, whether the specification properly discloses corresponding structure for the recited function in those limitations—**will be most significant** to the resolution of the case and/or **will be case or claim dispositive** or substantially conducive to promoting settlement.

Ex. 1008, 2 (Joint Claim Construction and Prehearing Statement) (emphasis added); *see also* Prelim. Resp. 12.

In so doing, Petitioner clearly and emphatically stated that whether the "component" terms are means-plus-function limitations is a dispositive issue for the litigation. Thus, Petitioner has indicated that it believes that the claims contain a means-plus-function limitation, thereby implicating 37 C.F.R. § 42.104(b)(3). In the present case however, Petitioner does not address the issue. Rather, Petitioner merely provides a footnote to state its litigation position.

Even though Patent Owner argued for the plain and ordinary meaning of the "component" terms in the litigation, it also set forth an alternative means-plus-function claim construction position. Thus, both parties previously indicated the importance of considering whether the "component" terms are means-plus-function limitations, further implicating the applicability of 37 C.F.R. § 42.104(b)(3).

Under these facts we determine that 37 C.F.R. § 42.104(b)(3) mandates that the Petition "identify the specific portions of the specification that describe the structure, material, or acts corresponding to each claimed function." The Petition failed to do so. At a minimum, the Petition should have explained why the plain and ordinary meaning of the "component" terms should apply in this proceeding (why the inconsistent positions are warranted) or set forth an alternative means-plus-function claim construction. CTPG 45.

As a clarification, our rules do not necessarily prohibit petitioners from taking inconsistent claim construction positions before the Board and a district court. *See 10x Genomics, Inc. v. Bio-Rad Lab'ys, Inc.*, IPR2020-00086, Paper 8 at 18 (PTAB Apr. 27, 2020). However, here, where Petitioner has emphasized in district court that whether the "component" terms are means-plus-function limitations not only "will be most significant"

but, "will be case . . . dispositive" and both parties previously provided the district court with competing means-plus-function claim constructions, we determine the Petition to be deficient under our rules.[4]

III. CONCLUSION

For the foregoing reasons, we determine that the Petition fails to satisfy the requirements of 37 C.F.R. § 42.104(b)(3). Accordingly, we decline to institute an *inter partes* review.

IV. ORDER

In consideration of the foregoing, it is hereby:

ORDERED that, pursuant to 35 U.S.C. § 314(a), *inter partes* review is *denied* and no *inter partes* review is instituted.

[4] We further decline to provide a claim construction of the "component" terms which are not briefed by either party in this proceeding.

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CAMBRIDGE MOBILE TELEMATICS, INC.,
Petitioner,

v.

SFARA, INC.,
Patent Owner.

IPR2024-00952
Patent 8,989,952 B2

HORVATH, *Administrative Patent Judge*, Concurring.

I. CONCURRENCE

I concur with the Majority's decision to deny the Petition, but would deny the Petition for a different reason.

A. Discretionary Denial Under 35 U.S.C. § 314(a)

Unlike the Majority, I would not discretionarily deny the Petition for Petitioner's alleged failure to construe the claims or to explain why the claims are not means-plus-function claims. Although 37 C.F.R. § 42.104(b)(3) ("rule 104(b)(3)") requires a petitioner to state "[h]ow the challenged claim is to be construed," a failure to do so does not require

denying a petition. For example, the CTPG states that "[a] petitioner who chooses not to address construction under § 112(f) *risks* failing to satisfy the requirement of 37 C.F.R. § 42.104(b)(3)." CTPG at 45 (emphasis added). But risking failure is not failing, and neither rule 104(b)(3) nor the CTPG mandate that a petition *must fail* when a petitioner fails to satisfy rule 104(b)(3). Indeed, our rules allow us to "waive or suspend a requirement of parts 1, 41, and 42," including rule 104(b)(3), further establishing that a petition need not fail or be denied for failing to comply with the rule. 37 C.F.R. § 42.5(b).

Moreover, Petitioner arguably *has* satisfied rule 104(b)(3) because Petitioner *has* stated "[h]ow the challenged claim is to be construed," namely, by giving all terms their plain and ordinary meaning. Pet. 5. Although Petitioner argued differently in district court, rule 104(b)(3) does not require Petitioner to construe the claims consistently here and in district court. *See Samsung Elecs. Co., Ltd v. Cellect, LLC*, IPR2020-00476, Paper 14 at 12 (PTAB July 31, 2020) ("It is not a requirement of [rule] 104(b)(3) that for every term for which Petitioner has proposed an express construction in related district court litigation, Petitioner must propose the same construction in the Petition.").

I would also not deny the Petition because it failed to explain why the challenged claims are not "means-plus-function" claims or, if they are, to identify structure corresponding to the recited functions. Rule 104(b)(3) only requires a petition to identify corresponding structure "[w]here the claim to be construed contains a means-plus-function or step-plus-function limitation." But deciding whether a claim contains a mean-plus-function limitation is an issue for the Board to decide, not the petitioner. *See Markman v. Westview Instr., Inc.*, 517 U.S. 370, 391 (1996) (claim

"interpretation . . . is an issue for the judge"); *Kemco Sales, Inc. v. Control Papers Co., Inc.*, 208 F.3d 1352, 1360 (Fed. Cir. 2000) ("Whether the language of a claim is to be interpreted according to 35 U.S.C. § 112, ¶ 6,[1] i.e., whether a claim limitation is in means-plus-function format, is a matter of claim construction and is thus a question of law."); *Williamson v. Citrix Online, LLC*, 792 F.3d 1339, 1346 (Fed. Cir. 2015) ("Regarding questions of claim construction, including whether claim language invokes 35 U.S.C. § 112, para. 6, the district court's determinations . . . are legal questions that we review de novo.").

B. Claim Construction

In *inter partes* reviews, we construe the claims "using the same claim construction standard that would be used to construe the claim in a civil action under 35 U.S.C. 282(b)." 37 C.F.R. § 42.100(b) (2023). A patentee may recite a limitation in a claim for a combination as "a means or step for performing a specified function without the recital of structure, material, or acts in support thereof." 35 U.S.C. § 112, ¶ 6. "[U]se of the word 'means' in a claim element creates a rebuttable presumption that § 112 ¶ 6 applies." *Williamson*, 792 F.3d at 1348. "Nonetheless, mere incantation of the word 'means' in a clause reciting predominantly structure cannot evoke § 112 ¶ 6." *York Prods., Inc. v. Cent. Tractor Farm & Fam. Ctr.*, 99 F.3d 1568, 1574 (Fed. Cir. 1996). Conversely, "the failure to use the word 'means' [in a claim element] also creates a rebuttable presumption—this time that § 112 ¶ 6 does not apply." *Williamson*, 792 F.3d at 1348. However, this

[1] The Leahy-Smith America Invents Act, Pub. L. No. 112-29, 125 Stat. 284, 285–88 (2011), revised 35 U.S.C. § 112. 35 U.S.C. § 112(f) is identical in content to 112, ¶ 6.

presumption can also be overcome if the claim element fails to recite sufficiently definite structure for performing a recited function. *Id.* at 1349. Significantly, a claim element that is otherwise written in purely functional terms does not recite sufficiently definite structure if it only recites generic or coined terms that lack a clear meaning. *Id.* at 1350 ("Generic terms such as 'mechanism,' 'element,' 'device,' and other nonce words . . . may be used in a claim in a manner that is tantamount to using the word 'means' because they 'typically do not connote sufficiently definite structure.'").

"Construing a means-plus-function claim term is a two-step process. The court must first identify the claimed function. Then, the court must determine what structure, if any, disclosed in the specification corresponds to the claimed function." *Id.* at 1351 (internal citation omitted). "[S]tructure disclosed in the specification is 'corresponding' structure only if the specification or prosecution history clearly links or associates that structure to the function recited in the claim." *B. Braun Med., Inc. v. Abbott Labs.*, 124 F.3d 1419, 1424 (Fed. Cir. 1997) (citation omitted). If the corresponding structure is a processor executing computer software, the specification must disclose and clearly link the recited function to "[an] algorithm that transforms [a] general purpose microprocessor into a 'special purpose computer programmed to perform the disclosed algorithm.'" *Aristocrat Techs. Austl. Pty Ltd. v. Int'l Game Tech.*, 521 F.3d 1328, 1338 (Fed. Cir. 2008).

Claims 1, 7, and 13 recite various "components" for performing various functions. Ex. 1001, 16:64–17:10, 17:54–18:3, 18:45–67. For example, claim 1 recites "a first detecting component operable [to] detect a first parameter . . ." and other functions. *Id.* at 17:1–3. Claim 7 recites "detecting, via a first detecting component, a first parameter." *Id.* at 17:60.

Claim 13 recites a computer readable medium having computer-readable instructions that, when executed by a computer, cause the computer to perform a method that includes "detecting, via a first detecting component, a first parameter." *Id.* at 18:54.

The term "first detecting component" is a nonce-word that does not connote a definite structure. *See Williamson*, 792 F.3d at 1350 (identifying words such as "mechanism," "element," "device," and others as verbal constructs that do not connote sufficiently definite structures). Indeed, the Specification discloses all of the "components" recited in claims 1, 7, and 13, including the "first detecting component," can be "implemented as a computer having tangible computer-readable media for carrying or having computer-executable instructions or data structures stored thereon." Ex. 1001, 5:33–41. Thus, like the word "module," a recognized nonce word, each of the recited "components" is nothing more than "a generic description for software or hardware that performs a specified function" and their recitation "operate[s] as a substitute for 'means' in the context of § 112, para. 6." *Williamson*, 792 F.3d at 1350. Accordingly, we construe the "first detecting component" recited in claims 1, 7, and 13 as a means-plus-function limitation whose function includes "detecting a first parameter."[2]

---

[2] I note that method steps can include means-plus-function limitations. *See Rain Computing, Inc. v. Samsung Elecs. Am. Inc.*, 989 F.3d 1002, 1006–07 (Fed. Cir. 2021) (finding "Applicants are free to invoke § 112 ¶ 6 for a claim term nested in a method claim" and construing a "user identification module" recited in a method claim as a means-plus-function term); *Media Rights Techs., Inc. v. Capital One Fin. Corp.*, 800 F.3d 1366, 1374 (Fed. Cir. 2015) (construing a "compliance mechanism" recited in a method claim as a means-plus-function term).

The only disclosures in the Specification that are linked to the function of "detecting a first parameter" are (1) a "first detecting component" (Ex. 1001, code (57), 2:64–65,), (2) a "communication device" (*id.* at code (57), 4:50–53, 5:1–4, 16:47–53), (3) a "parameter-detecting component," which can be "a computer having tangible computer-readable media for carrying or having computer executable instructions or data structures stored thereon" or "any known device or system that is operable to detect a parameter" (*id.* at 5:33–41, 6:53–55, 8:48–51, 9:15–16, 15:13–14, 16:30–39, Fig. 4), (4) various "detecting components 402–408" within the "parameter-detecting component," which can have the same computer structure as the "parameter-detecting component" or can be a "known detecting component that is able to detect a known parameter" (*id.* at 9:15–36, 9:49–50, 10:17–19, 12:45–47, Fig. 4), (5) a "field-detecting component," which can have the same computer structure as the "parameter-detecting component" or can be "any known device or system that is operable to detect a field" (*id.* at 5:33–41, 6:11–13, 8:13–15, 8:48–51, 9:6–7, 10:26–27, 14:46–48, 16:30–39), and (6) a "device 202" that includes the "parameter-detecting component" and/or a "field-detecting component" (*id.* at 5:16–41, 7:37–41, Fig. 2). None of these disclosures reveal a sufficiently cognizable structure that performs the recited function of "detecting a first parameter."

The "first detecting component," "communication device," "parameter-detecting component," "detecting components 402–408," "field-detecting component," and "device 202" are not cognizable structures because they reveal little more than the same black-box structure—a "first detecting component"—recited in the claims. The computer implementing the functionality of the "parameter-detecting component," "field-detecting component," or "detecting components" is not a cognizable structure

because the Specification fails to describe an algorithm that would transform the computer into a "special purpose computer programmed to perform" the recited function of "detecting a first parameter." *Aristocrat*, 521 F.3d at 1338. Any "known device or system" that is operable to "detect a parameter" or "detect a field" is not a cognizable structure because the terms "device" and "system," like the term "component," are simply nonce words that fail to connote a sufficiently definite structure.

To avail oneself of the privilege of reciting a means-plus-function limitation, one must disclose a cognizable structure in the Specification that is clearly linked to and performs the recited function. *See Atmel Corp. v. Info. Storage Devices, Inc.*, 198 F.3d 1374, 1382 (Fed. Cir. 1999) (finding § 112 ¶ 6 "sets forth a simple requirement, a *quid pro quo*, in order to utilize a generic means expression," and further reasoning that "[a]ll one needs to do . . . is to recite some structure corresponding to the means in the specification . . . so that one can readily ascertain what the claim means"); *see also Med. Instr. and Diag. Corp. v. Electa AB*, 344 F.3d 1205, 1211 (Fed. Cir. 2003) (finding "[i]f the specification is not clear as to the structure that the patentee intends to correspond to the claimed function, then the patentee has not paid th[e] price" for using means-plus-function claiming).

Accordingly, for the reasons discussed above, I would find all claim limitations reciting the "first detecting component" are written in means-plus-function form and the Specification fails to discloses a cognizable structure corresponding to and performing its recited function of "detecting a first parameter."

C. Analysis of Petitioner's Contentions

Petitioner contends claims 1–18 are unpatentable over Green alone or in combination with Wright. Pet. 9–85. Patent Owner does not dispute

these contentions. Prelim. Resp. 10–33. Instead, Patent Owner argues we should discretionarily deny the Petition under *Fintiv* or because Petitioner has failed to construe the claims. *Id.* I would not decline the Petition for failure to construe the claims for the reasons discussed above. I need not decide whether to deny the Petition under *Fintiv* for the following reason.

To consider the merits of Petitioner's unpatentability challenges, one must undertake a two-step process that requires "construing the claim[s], a question of law for the court, followed by . . . a comparison of the construed claim[s] to the prior art." *Key Pharms. v. Hercon Labs. Corp.*, 161 F.3d 709, 714 (Fed. Cir. 1998). For means-plus-function limitations, the asserted "prior art must disclose not simply a means for achieving the desired function, but rather the *particular structure* recited in the written description corresponding to that function, or an equivalent thereof." *McGinley v. Franklin Sports, Inc.*, 262 F.3d 1339, 1361 (Fed. Cir. 2001). Thus, "a challenger who seeks to demonstrate that a means-plus-function limitation was present in the prior art must prove that the corresponding structure—or an equivalent—was present in the prior art." *Fresenius USA, Inc. v. Baxter Int'l, Inc.*, 582 F.3d 1288, 1299 (Fed. Cir. 2009).

As discussed above, all of the challenged claims recite a "first detecting component" limitation that is written in means-plus-function format, but the Specification fails to disclose a sufficiently definite corresponding structure that performs its function of "detecting a first parameter." Thus, I am unable to determine what specific prior art structure is needed to meet the limitation. *Fresenius*, 582 F.3d at 1299. Accordingly, I am unable to determine the merits of the Petition, and would deny the Petition for this reason. *See Samsung Elecs. Am., Inc. v. Prisua Engin. Corp.*, 948 F.3d 1342, 1353 (Fed. Cir. 2020) ("[T]he proper course for the

Board to follow, if it cannot ascertain the scope of a claim with reasonable certainty for purposes of assessing patentability, is to decline to institute the IPR.").

PETITIONER:

Linnea Cipriano
Douglas Kline
Andrew Ong
GOODWIN PROCTER LLP
lcipriano@goodwinlaw.com
dkline@goodwinlaw.com
aong@goodwinlaw.com

PATENT OWNER:

James Klaiber
KLAIBER IP LAW LLC
jklaiber@klaiberip.com

Tedd Van Buskirk
Richard Juang
Chandran Iyer
Scott Samay
DAIGNAULT IYER LLP
tvanbuskirk@daignaultiyer.com
richard.juang@gmail.com
cbiyer@daignaultiyer.com
ssamay@daignaultiyer.com