

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**ARKEMA FRANCE,**

**Petitioner,**

**v.**

**HONEYWELL INTERNATIONAL, INC.,**

**Patent Owner.**

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**IPR No. IPR2015-00916**

**U.S. Patent No. 8,710,282 B2**

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**PETITIONER'S UPDATED MANDATORY NOTICES  
PURSUANT TO 37 C.F.R. § 42.8**

## **MANDATORY NOTICES (37 C.F.R. § 42.8)**

Pursuant to 37 C.F.R. § 42.8, Arkema France (“Petitioner”), hereby submits the following Updated Mandatory Notices in connection with the Petition for *Inter Partes* Review of U.S. Patent No. 8,710,282 (“the ’282 Patent”), IPR2015-00916.

### **I. Real Party-In Interest (37 C.F.R. § 42.8(b)(1))**

Arkema France, Arkema, Inc., and Arkema S.A. are the real parties-in-interest.

### **II. Related Matters (37 C.F.R. § 42.8(b)(2))**

Petitioner has filed petitions for *Inter Partes Review* of the ’282 Patent in IPR Nos. IPR2015-00915 and IPR2015-00917.

Petitioner recently filed patent application no. 14/695,210 (“the ’210 Application”) claiming priority to French Patent Application No. FR0950157 and added claims by preliminary amendment that are, respectively, the same as, or substantially the same as, claims 21-27, 30-38 and 41-46 of the ’282 Patent.<sup>1</sup> FR 0950157 is a prior art reference cited by Petitioner in IPR 2015-00915. Petitioner filed the ’210 Application and added the foregoing claims within one year of the issuance of the ’282 Patent merely for the purposes of satisfying the requirements of pre-AIA 35 U.S.C. § 135 and preserving the right to an interference pending the

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<sup>1</sup> The following U.S. application claiming priority to French Patent Application No. FR0950157 is also pending: 14/670,886.

outcome of this and the above-discussed petitions for *Inter Partes* Review.

Petitioner has not requested an interference. No admission with regard to patentability or validity of the claims of the '210 Application is made.

Furthermore, Petitioner does not concede that the '210 Application is a judicial or administrative matter that would affect, or be affected by, a decision in this proceeding but nonetheless discloses the '210 Application in this paper out of the abundance of caution.

### **III. Counsel & Service Information (37 C.F.R. §§ 42.8(b)(3)-(4))**

Lead Counsel: Jon Beaupré (Reg. No. 54,729)

Back-up Counsel:

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Respectfully submitted,

**BRINKS GILSON & LIONE**

June 3, 2015

Date

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served, in accordance with the Patent Owner's designated electronic service information, on June 3, 2015 by electronic mail upon the following addresses for Patent Owner and its counsel of record:

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Respectfully submitted,

**BRINKS GILSON & LIONE**

June 3, 2015

Date

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