

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner,

v.

YECHEZKAL EVAN SPERO
Patent Owner.

U.S. Patent No. 11,208,029 to Spero

Case No.: IPR2022-01586

PATENT OWNER'S UPDATED MANDATORY NOTICE

I. Mandatory Notices under 37 C.F.R. § 42.8

Pursuant to 37 C.F.R. § 42.8(a)(3), Patent Owner, Yechezkal Evan Spero, (“Patent Owner”) hereby submits the following Updated Mandatory Notice to update the mailing address of Patent Owner’s counsel associated with the firm Brooks Kushman P.C. and to reflect petitions filed by Porsche Cars North America, Inc. and Mercedes-Benz USA, LLC. All other information in Patent Owner’s Mandatory Notice is unchanged. Patent Owner reserves its right to supplement or modify these Notices.

A. Real Party-In-Interest (37 C.F.R. § 42.8(b)(1)) – Unchanged

B. Related Matters (37 C.F.R. § 42.8(b))(2))

Patent Owner identifies the following related current and/or former proceedings involving the patent-at-issue:

1. *Unified Patents, LLC. v. Torchlight Technologies LLC*, IPR2022-01500 (IPR of U.S. Patent 11,208,029, settled).
2. *Torchlight Technologies LLC v. Daimler AG et al*, No. 1:22-cv-00751 (D.D.E.) (pending). Petitioner, Volkswagen Group of America, Inc., was voluntarily dismissed without prejudice from this civil action on September 23, 2022.

3. *Torchlight Technologies LLC v. General Motors LLC et al*, No. 1:22-cv-00752 (D.D.E.) (pending).
4. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01034 (IPR of U.S. Patent 11,208,029, pending).
5. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01122 (IPR of U.S. Patent 11,208,029, pending).
6. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01126 (IPR of U.S. Patent 11,208,029, pending).

Patents in the same patent family as the '029 patent have been subject to multiple patent office proceedings:

1. U.S. Reissue Application 16/858,342 (Reissue of U.S. Patent 9,955,551, pending).
2. *Ex Parte* Reexamination 90/014,815 (Reexamination of U.S. Patent 9,955,551, concluded).
3. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00315 (IPR of U.S. Patent 9,955,551, pending).

4. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00318 (IPR of U.S. Patent 9,955,551, pending).
5. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00336 (IPR of U.S. Patent 9,955,551, institution denied).
6. *Mercedes-Benz USA, LLC. v. Yechezkal Evan Spero*, IPR2023-01039 (IPR of U.S. Patent 9,955,551, pending).
7. *Mercedes-Benz USA, LLC. v. Yechezkal Evan Spero*, IPR2023-01040 (IPR of U.S. Patent 9,955,551, pending).
8. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01225 (IPR of U.S. Patent 9,955,551, pending).
9. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01296 (IPR of U.S. Patent 9,955,551, pending).
10. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00197 (IPR of U.S. Patent 10,894,503, pending).
11. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00328 (IPR of U.S. Patent 10,894,503, pending).

12. *Volkswagen Group of America, Inc., v. Yechezkal Evan Spero*, IPR2023-00335 (IPR of U.S. Patent 10,894,503, pending).
13. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01026 (IPR of U.S. Patent 10,594,503, pending).
14. *Mercedes-Benz USA, LLC v. Yechezkal Evan Spero*, IPR2023-01027 (IPR of U.S. Patent 10,594,503, pending).
15. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01231 (IPR of U.S. Patent 10,894,503, pending).
16. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01320 (IPR of U.S. Patent 10,894,503, pending).
17. *Porsche Cars North America, Inc. v. Yechezkal Evan Spero*, IPR2023-01321 (IPR of U.S. Patent 10,894,503, pending).

C. Lead and Back-Up Counsel - 37 C.F.R. § 42.8(b)(3) – Lead and Back-Up Counsel remain unchanged however, mailing address is updated as follows:

Lead Counsel	Back-Up Counsel
Sangeeta G. Shah (Reg. No. 38,614) BROOKS KUSHMAN P.C. 150 W. Second St., Suite 400N Royal Oak, MI 48067-3846 Telephone: (248) 358-4400 Facsimile: (248) 358-3351 sshah@brookskushman.com	David S. Bir (Reg. No. 38,383) Andrew B. Turner (Reg. No. 63,121) BROOKS KUSHMAN P.C. 150 W. Second St., Suite 400N Royal Oak, MI 48067-3846 Telephone: (248) 358-4400 Facsimile: (248) 358-3351 dbir@brookskushman.com aturner@brookskushman.com

D. Service Information - 37 C.F.R. § 42.8(b)(4) – Unchanged

Respectfully submitted,

Dated: January 3, 2024

/ Sangeeta G. Shah /
Sangeeta G. Shah (Reg. No. 38,614)
David S. Bir (Reg. No. 38,383)
Andrew B. Turner (Reg. No. 63,121)
Brooks Kushman P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067-3846
(248) 358-4400

Attorneys for Patent Owner

Certificate of Service

The undersigned hereby certifies that on January 3, 2024, a complete and entire copy of **Updated Patent Owner's Updated Mandatory Notice**, was served via electronic mail by serving the correspondence email addresses as follows:

Lead Counsel	Back-Up Counsel
Michael D. Specht (Reg. No. 54,463) Sterne, Kessler, Goldstein & Fox P.L.L.C. 1101 K Street, N.W., 10 th Floor Washington D.C., 20005 Telephone: (202) 371-2600 Facsimile: (202) 371-2540 mspecht-PTAB@sternekessler.com	Jason A. Fitzsimmons (Reg. No. 65,367) Daniel E. Yonan (Reg. No. 53,812) Ian Soule (Reg. No. 74,290) Sterne, Kessler, Goldstein & Fox P.L.L.C. 1101 K Street, N.W., 10 th Floor Washington D.C., 20005 Telephone: (202) 371-2600 Facsimile: (202) 371-2540 jfitzsimmons-PTAB@sternekessler.com ; dyonan-PTAB@sternekessler.com ; isoule-PTAB@sternekessler.com ; PTAB@sternekessler.com

Respectfully submitted,

/ Sangeeta G. Shah /
Sangeeta G. Shah (Reg. No. 38,614)
David S. Bir (Reg. No. 38,383)
Andrew B. Turner (Reg. No. 63,121)
Brooks Kushman P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067-3846
(248) 358-4400

Attorneys for Patent Owner