**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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| *In re* patent of Jacobs *et al.* | § | |
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| U.S. Patent 10,021,380 | § | Group Art Unit: 3992 |
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| Title: FASTER STATE TRANSITIONING FOR CONTINUOUS ADJUSTABLE 3DEEPS FILTER SPECTACLES USING MULTI-LAYERED VARIABLE TINT MATERIALS | § | Requester Dkt. No.: VDP380 |
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**REPLY TO PATENT OWNER'S STATEMENT TO THE REQUEST FOR *EX PARTE* REEXAMINATION OF U.S. PATENT 10,021,380**

Pursuant to the provisions of 37 C.F.R. § 1.535, Unified Patents, LLC ("Requester") hereby submits this Reply to Patent Owner VDPP LLC's ("PO" or "VDPP") Statement in *Ex Parte* Reexamination ("PO Statement"). The PO Statement was served to Requester on March 24, 2025, making Monday, May 26, 2025 the due date for this Reply. As indicated in the certificate of service filed herewith, this Reply is being filed and served on Thursday, May 22, 2025. Requester believes no fee is due with this submission, however the Office is hereby authorized to charge any fee deficiency or credit any over-payment to Deposit Account 50-6990.

VDPP's PO Statement is replete with errors. PO focuses on creating an "Eternalism" effect when such recitations are not in the claims, misunderstands the combinations proposed, and relies on unsupported attorney argument for its positions. Accordingly, Requester maintains the Challenged Claims of U.S. Patent 10,021,380 (the "'380 Patent") are invalid over the prior art and evidence provided in the Request. Requester therefore requests that an Office Action rejecting claims 1-10 be issued.

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## I. INTRODUCTION

VDPP's PO Statement is misses the mark on several key points of the Request. Throughout its arguments, PO alleges the grounds are deficient because they do not consider the "Eternalism" effect. *See, e.g.,* PO Statement, 13-15, 24; *infra,* Sections II.A and III. But this is reading the specification into the claims and adding limitations that are plainly not present. Indeed, PO's own allegations against video frame interpolation technologies (Ex. 1023), security camera zooming and pixel correction (Ex. 1024), and cameras with zooming and night vision (Ex. 1025) bely PO's current arguments. PO repeatedly reads limitations from the specification into the claims to attack the prior art presented in the Request.

Elsewhere, the PO Statement misunderstands the Requester's positions, for example, incorrectly alleging that the Requester's TV-Conversion rationale requires a conversion from CCIR-G video to CCIR-M video when Requester's positions are based on Kasagi's disclosures for TV-system conversions generally. *Infra,* Section II.B. PO also incorrectly alleges that SNQ6 is a combination of Miyazaki, Compton, and Kasagi when the Request clearly shows a combination of Miyazaki and Compton alone, with Kasagi merely providing corroborating evidence of what a POSITA would have known. *Infra,* Section IV. The PO misstates and/or misapplies the law in several of its obvious-to-try arguments. *Infra,* Sections II-IV. And the PO Statement presents unsupported attorney argument that provides questionable conclusions in some parts (e.g., PO's interpretation of Yamada's disclosure) and even supports Requester's positions in others (e.g., arguments regarding how Yamada's "registrating" can reduce noise and compensate for distortions). *Infra,* Section III.

These and several other disjointed allegations are made in the PO Statement. These errors are addressed below, and this Reply further demonstrates how the Request has shown the Challenged Claims 1-10 to be unpatentable.

## II. KASAGI DISCLOSES CLAIMS 1 AND 6 (SNQS 1-2)

As explained in the Request, Kasagi discloses claims 1 and 6 with two embodiments: (1) zooming with superimposing and (2) TV-system conversion. The PO Statement does not overcome either's showing of the unpatentability of the claims.

### A. Kasagi's Zooming and Superimposing Embodiment

In the zooming with superimposing embodiment, the Request demonstrates how Kasagi discloses both the *combining* sequential *frames* and *expanding the image frames.*

First, the Request shows multiple ways that Kasagi discloses the recited *combining of* sequential *frames* relying on Kasagi's disclosure of (a) "superimposing" image frames, which encompasses both the combination of frames from different videos and the combination of sequential frames, (b) an example of PIP superimposing, which combines frames (albeit from different videos), and (c) TV-system conversion, which combines sequential frames. Request, 24-32[1]. The breadth of Kasagi's term "superimposing" and the additional example of combining sequential frames for TV-system conversion, which a POSITA would recognize as a type of superimposing, is supported by the testimony of Dr. Freedman. Ex. 1003, ¶¶70-73. Moreover, to the extent there was any question that "superimposing" disclosed the concept of superimposing sequential images, the Request even provides the motivations for doing so. Request, 31-32; Ex. 1003, ¶74-76.

PO's initial argument that Kasagi does not teach this element is that Kasagi's *combination of* sequential *frames* does not "produce more fluid or natural illusion of continuous movement from a finite number of image pictures." PO Statement, 12. But such language is not required by the claims. Indeed, as detailed in the Request, the claims of the '380 Patent are incredibly broad, and claims 1 and 6 do not even require a bridge frame or repetition of the frames, much less any mention of creating an illusion of Eternalism. Request, 1-2. Moreover, PO's assertions that Kasagi's teachings must provide the same intended functionality of the '380 Patent are belied by its assertions of the claims against numerous technologies that have no relationship to Eternalism. *See, e.g.,* Exs. 1023-1025.

PO's other attack on this element is that the Request's obvious-to-try rationale was deficient. PO Statement, 14. Requester notes, however, that its obvious-to-try rationale is merely a back-up argument, as Kasagi's disclosures of "superimposing" and "forming a composite image" would have caused a POSITA to have immediately envisioned the combination of sequential

[1] Requester notes that the Request is supported by the testimony of Dr. Freedman (Exhibit 1003 of the Request) and claim charts (Appendices A-D of the Request). For simplicity, this Reply largely cites to the Request itself, though additional support is provided in the Appendices and Exhibit 1003.

images. Request, 31-32; Ex. 1003, ¶74. Moreover, a POSITA would have been motivated to combine sequential images for the common and well-known reason that such a combination "would allow the conversion of TV signals from one system to be played on another system." Request, 32; Ex. 1003, ¶75. For each of these reasons, Kasagi discloses or at least renders obvious *combining* sequential *frames*.

Nevertheless, the Request's obvious-to-try rationale is not deficient. PO argues that something is obvious-to-try only if it provides a "potential solution to address the issue of Eternalisms." PO Statement, 15. Basically, since Eternalism is allegedly not obvious, PO believes nothing can be obvious-to-try. This is incorrect because (1) Eternalism is not recited in the claims (as explained above), and (2) PO's understanding of the obvious-to-try rationale is incorrect. The Request provides a proper obvious-to-try rationale because the potential solutions for obtaining Kasagi's disclosed "superimposing" or "forming a composite image" are finite and selected from the potential solutions known to POSITAs. Request, 31-32. The three finite options are identified in the Request—"(1) the combination of two unrelated images (2) the combination of two images from the same video but not sequential, and (3) the combination of two sequential images from the same video" (Request, 32)—and supported by the testimony of Dr. Freedman (Ex. 1003, ¶75). Thus, the Request properly shows how Kasagi discloses *combining* sequential *frames*.

Next, Kasagi's zooming and superimposing embodiment also discloses the recited *expanding the image frame*, whereby, for example, a 3x3 matrix of nine pixels is expanded to a larger frame size of a 4x4 matrix of 16 pixels. Request, 26-27 (citing Ex. 1018).

PO's only argument that Kasagi does not disclose *expanding the image frame* is that Kasagi does not disclose it in the context of "produc[ing the] illusion of depth in motion pictures, as the '380 Patent describes." PO Statement, 13. But the claims are not directed to Eternalism and do not recite such language. Thus, PO's attacks on Kasagi's disclosure of *expanding the image frame* fail.

Finally, the Request cites the explicit disclosure in Kasagi both *expanding the image frame* and *combining* sequential *frames* with its explanation of "additional superimposing means" that can be added to any of the previously disclosed expanding techniques, including when the images frames are "enlarged." Ex. 1018, 34:63-35:55; Request, 26-27.

PO's argument that the results of "'expanding the image frame' and 'combination of sequential frames' of Kasagi are different than those of the '380 Patent" are legally insufficient at least because the results are not claimed. PO Statement, 14. Even if PO's statement that

"Eternalisms composing depth as well as ongoing movement" was an "unpredictable result" is true (PO Statement, 14), such a result is not recited or required by the claims.

### B. Kasagi's TV Conversion Embodiment

As noted above, at least Kasagi's zooming and superimposing embodiment render claims 1 and 6 unpatentable, which is sufficient to render the claims unpatentable.

But the Request goes further to address a second Kasagi embodiment—the TV-system conversion embodiment—that also renders the claims unpatentable.

As explained in the Request, Kasagi provides a modular set of steps for converting frames of video for one TV-system into frames of video for another TV-system. Request, 33. Kasagi recognizes that two elements need to be converted to obtain video for a different system, i.e., (1) the size of the image frames and (2) the number of frames. Kasagi provides one example of converting CCIR-G video to CCIR-M video, which requires (1) reducing the size of the image frames and (2) increasing the number of frames (i.e., by combining adjacent frames to obtain the additional needed frames). Request, 32; Ex. 1018, 36:9-15. But Kasagi is not limited to only that example and recognizes that "a signal-converting device can be provided that would allow the conversion of the signals of [any] one TV system to those of another TV system." Request, 32 (quotations omitted).

PO misunderstands the Request (and Kasagi's disclosure), arguing that Kasagi's example does not meet the claims. PO Statement, 17-19.

But this is not what the Request proposes. Kasagi's modular method is not limited to the conversion of CCIR-G video to CCIR-M video and vice-versa—Kasagi's methods are intended for "various television systems employed all over the world." Ex. 1018, 35:58-61; Request, 32 (citing Ex. 1018, 35:68-36:15). Indeed, the example of "converting the signals of the CCIR-G system to the signals of the CCIR-M system" is merely to "explain[] the gist of the technique." Ex. 1018, 36:9-10.

Thus, the Request explains that "Kasagi recognizes various conversion may be needed," so in addition to providing the example of converting by "reducing image size and combining frames," Kasagi also discloses "how to expand frame size." Request, 32. That is, Kasagi teaches a POSITA how to convert video with a first image frame size and first number of frames into video with a second frame size and second number of frames, and it is not limited to the conversion of CCIR-G video to CCIR-M video.

Additionally, because Kasagi's only example shows combining the images first before changing the image frame size, the Request explains the reasons why a POSITA would be motivated to change the image frame size first. Request, 33-34. The Request reviews Kasagi's own teachings to switch the steps with its disclosure to "add[] superimposing means" after enlarging an image, and the Request also explains how it would be obvious-to-try the steps in either order. Request, 33-34; Ex. 1003, ¶¶80-83.

Along similar lines, PO alleges that by "the proposed modification renders the prior art unsatisfactory for its intended purpose-TV-system conversion," because enlarging images and increasing the number of frames "can not convert[] CCIR-G video to CCIR-M or convert[] CCIR-M video to CCIR-G." PO Statement, 18-19. But converting CCIR-G to CCIR-M and vice-versa are merely examples of TV-system conversions. Kasagi discloses this example to show how its broadly disclosed methods can be applied to "various television systems." Ex. 1018, 35:58-61. The intended purpose of Kasagi is to provide conversion methods for "various television systems employed all over the world," and as such, its system provides for both enlarging images and increasing video frames.

Moreover, the proposed modification merely changes the order of the steps; not the function of Kasagi's system. That is, Kasagi provides a system with a module to increase frame count by combining sequential frames (Ex. 1018, 36:31-34), and a module to increasing image size (Ex. 1018, Fig. 41B, 37:15-18, 37:44-46). Even Kasagi's unmodified system (with the modular steps performed as shown in Kasagi's explicit example) can increase the frame number and increase the image size because doing so is relevant to TV-system conversion—in general—even if that particular embodiment does not convert CCIR-G to CCIR-M video. The Request merely proposes changing the order, and that proposed modification is not challenged in the PO Statement.

For at least these reasons and those presented in the Request, each of Kasagi's zooming and superimposing embodiment and Kasagi's TV-system conversion embodiment renders claims 1 and 6 unpatentable.

## III. YAMADA DISCLOSES CLAIMS 1 AND 6 (SNQS 3-4)

As explained in the Request, Yamada discloses several methods of enhancing images, including (1) enlarging sequential images to, for example, identify a license plate number and (2) combining images to obtain information for images that were too dark. Request, 35-36 (citing

Ex. 1019, 10c1-10c2, 12c1, 12c2-13c1, Figs. 4, 6). Particularly relevant is Yamada's disclosure of a combined method that results in "General Darkness Correction and General Picture Enlargement" whereby "sequential images" were enlarged and "Darkness Correct[ed]" to identify "a vehicle passing in the shade of a tree." Ex. 1019, 12c2-13c1.

A POSITA's understanding of how Yamada discloses the enlarging and combining of sequential images in its "General Darkness Correction and General Picture Enlargement" example, supported by expert testimony, is provided in the Request. Request, 35-37. The Request also provides additional reasons as to how a POSITA would have found it obvious to combine Yamada's image enlargement and registration for darkness correction techniques. Request, 37-38.

PO's first critique is that Yamada does not connect the dots of its disclosure sufficiently enough for the PO's attorney's understanding, which is unsupported by POSITA testimony. For example, because Yamada does not explicitly state in the same paragraph at the top of 13c1 that the "sequential images" were combined to identify a shaded (e.g., darkened) license plate, but instead Yamada explains in the very next paragraph that combining images is effective for clarifying "an image which is very dark," PO's attorney does not believe that Yamada discloses combination of the "sequential images." PO Statement, 20-21.

But, as explained by Dr. Freedman, "Yamada's disclosure of 'General Darkness Correction and General Picture Enlargement' where by [*sic*] 'sequential images' were enlarged to identify 'a vehicle passing in the shade of a tree' (Ex. 1019, 13c1) along with Yamada's explanation that combining 'several images' is "effective [for] an image which is very dark' (Ex. 1019, 13c1) teaches a POSITA that the vehicle 'in the shade of a tree' was identified by combining the 'sequential' enlarged images." Ex. 1003, ¶89. Indeed, the heading of that section is "General Darkness Correction and General Picture Enlargement," and Yamada does not provide any explanation as to how enlarging several pictures, alone, would yield "Darkness Correction." It is the following paragraph that explains how "registrating several images…[is] effective to an image which is very dark." Ex. 1019, 13c1; Request, 37; Ex. 1003, ¶91.

Moreover, to the extent Yamada was not explicit enough, the Request also provides reasons why a POSITA would have found it obvious to combine Yamada's disclosures of "enlargement of sequential images" with "registrating several images" (i.e., combining the images) to arrive Yamada's stated "General Darkness Correction and General Picture Enlargement" to "identif[y] of a vehicle passing in the shade of a tree." Request, 37-38.

The PO Statement next attacks the Request's combination of Yamada's enlargement of sequential images with its disclosure of combining sequential images by asserting "[i]t is improper to combine references where the references teach away from their combination." PO Statement, 23 (emphasis added). But contradicting its own stated standard, the PO Statement does not cite to Yamada but instead cites another document, Exhibit 2003[2]. PO Statement, 22-23. Exhibit 2003 purports to be an article published in 2012—over a decade after Yamada was published. There is no evidence that anyone reading Yamada when published (or for more than a decade after) would have any qualms about enlarging and combining sequential images.

Additionally, the relevance of Exhibit 2003 is questionable when Exhibit 2003 does not use any form of the word "registration," and when Exhibit 2003 attempts to transform standard definition television footage to meet the high standards of HDTV quality video while Yamada discusses the registration of images to improve footage from security cameras from the late 1990s on a Pentium II computer (Ex. 1019, 10c1-11c1). That is, there is no reason to believe that concerns that might be relevant to someone trying to produce HDTV-quality video would also be concerns to someone a decade earlier trying to merely make a license plate legible, much less concerns that taught away from using registration.

Indeed, even the PO hesitantly characterizes Exhibit 2003 as merely saying that "In typical image registration[3]…images need not be enlarged." PO Statement, 22 (emphasis added). This is because, according to the PO's attorney's understanding of Exhibit 2003, "image enlargement may introduce artifacts." PO Statement, 23 (emphasis added).

But the possibility of an undesirable effect so that for typical uses, images do not need to be enlarged (especially an effect that seems unrecognized for more than a decade, and in a paper for obtaining HDTV quality images) does not reach the level of teaching away, much less "overcome [the] strong case of obviousness" presented in the Request. MPEP § 2144.03 (quoting *In re Geisler,* 116 F.3d 1465, 1471 (Fed. Cir. 1997)).

Moreover, even if there were some drawbacks (and again, Requester does not concede that PO has shown any), the standard for obviousness does not require finding "the *best* option, only

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[2] Undated Exhibits 2001 (a Wikipedia entry) and 2002 ("Evident" Webpage about image averaging) are cited in this section of the PO Statement to allegedly explain registration.

[3] Again, this is the attorney's unsupported assertion that Exhibit 2003 discusses "registration" as Exhibit 2003 does not use any form of the term "registration."

that it be a *suitable* option from which the prior art did not teach away." *Par Pharm. v. TWI Pharms., Inc.*, 773 F. 3d 1186, 1197–98 (Fed. Cir. 2014). And, for the reasons presented in the Request and explained by Dr. Freedman, SNQs 3-4 present at least suitable options.

PO further alleges that the Request's obvious-to-try argument is deficient. PO Statement, 23. Requester notes, however, that the "obvious-to-try" rationale is merely a back-up argument, as a POSITA's reading of Yamada's text (e.g., the word usage and placement of explanations) would have disclosed the use of both image enlargement and the combination of sequential images. Ex. 1003, ¶¶90-91.

Nevertheless, the obvious-to-try rationale is not deficient because the Request properly shows how Yamada only provides a finite number of options (two) for achieving the stated "General Darkness Correction" for when a vehicle is under "the shade of a tree": "(1) using the "device to check and modify analog images" that "can correct the dark images whose the video signal is weak" (Ex. 1019, 11c1), and (2) registration of images to superimpose (combine) them (Ex. 1019, 13c1)." Ex. 1003, ¶92. Both options are obvious-to-try, and Dr. Freedman goes further in explaining why the second option (registration) is most likely. Ex. 1003, ¶¶93-94.

PO's argument rests on several misunderstandings. First, there are not "six methods" to choose from (PO Statement, 24) because not all of Yamada's "six methods" are relevant to the desired result of "General Darkness Correction" for when a vehicle is under "the shade of a tree." There are only two methods that Yamada disclose as being relevant to darkness correction—the two identified in the Request. Moreover, even if there were 6 or 30 or 120 options (PO Statement, 24), these are still a finite number of options that are easily predictable and identifiable. And even if Yamada is found to provide a larger number of possible choices, Yamada also provided an indication of the parameters that were critical (e.g., correcting darkness), it gave direction as to which of the possible choices is likely to be successful (e.g., identifying two options as addressing darkness issues), and it provided a clear indication of the particular form of the successful result (e.g., ability to identify a license plate that was previously shaded). *Compare, e.g.,* MPEP § 2143(E) (providing the distinguishable analysis in *In re Kubin,* 561 F.3d 1351, 1359 (Fed. Cir. 2003) that obvious-to-try analysis is improper when the prior art gives no indication of the critical parameters or likely successful choices and did not provide guidance on the form of the claimed invention).

PO also alleges—based solely on an attorney's interpretation of undated, general descriptions of registration and image averaging (Exs. 2001 and 2002)—that the Request's assertion that "the shade caused each frame to contain missing pieces of the image, and by combining the sequential images showing the vehicle with different illuminations as it passed, a complete picture of the vehicle could be obtained" is incorrect. PO Statement, 24-25.

This is generally a spurious attack on a particular mechanism or use of registration that is largely irrelevant to the Request. Yamada itself describes registration as improving image quality for an image that is "very dark," and that teaching is what is relied upon in the Request. Nevertheless, the Request provides the additional information from the perspective of a POSITA of how registration can improve image quality, and it is a single sentence in that explanation that the PO has taken issue with. But PO's own interpretation of registration supports the sentence it is attempting to discredit. That is, by combining image frames to, say, "reduce noise" (*see* PO Statement, 25), aberrant or missing data from one image can be supplemented or replaced by data from the other image to provide a complete picture to the viewer, as is indicated in that sentence. And by combining frames to, say, "compensate[e] for shifts, rotations,…distortions" (*see* PO Statement, 25), image data missing or distorted in one image can be supplemented or replaced by the other image data. This is consistent with Dr. Freedman's explanation that "the shade caused each frame to contain missing pieces of the image" (e.g., dark pixels missing data) so "by combining the sequential images showing the vehicle with different illuminations as it passed, a complete picture could be obtained" (e.g., pixels for the license plate that have data because they are illuminated are used to supplement or replace the missing data from when the pixels were shaded, with shift, rotation, and distortion compensation ensure that the pixels from the second data correspond to the pixels from the first image).

Finally, as with the Kasagi grounds, PO argues that there is no obvious solution to providing the Eternalism effect, so any obvious-to-try rationale must fail. PO Statement, 24.

Again, this is incorrect because Eternalism is not recited in the claims, and PO's arguments are counter to the positions it has taken in court. The Request's obvious-to-try argument addresses the finite (two) options for achieving Yamada's stated "General Darkness Correction" for when a vehicle is under "the shade of a tree." With that minor modification (to the extent any modification was even needed to arrive at the solution of using Yamada's registration to *combine the* sequential *image frame[s]*), Yamada discloses the entirety of claims 1 and 6, as demonstrated in SNQs 3-4.

## IV. MIYAZAKI AND COMPTON DISCLOSE CLAIMS 1-10 (SNQ 6)

As explained in the Request, SNQ6 is based solely on the teachings of Miyazaki and Compton read in view of a POSITA. Request, 41; Appendix D. Basically, Miyazaki discloses how to interpolate or *combine* sequential *frame[s],* for example, when converting a 60 frame per second standard definition television broadcast into a 120 frame per second high definition broadcast. Request, 48. Miyazaki recognizes the known motivation to convert video from one system to another's format, but it focuses on changing the number of frames, and it provides examples in light of the NTSC market, which uses 525-line frame sizes. Request, 47-49. A POSITA would have understood, however, that converting between formats often involves changing both the number of frames and image frame size, and would, thus, be motivated to seek teachings for changing the size of image frames. Request, 48. Compton provides simple methods for changing the size image frames, such as the "simple" "linear stretch" of frames. Ex. 1022, [0034]; Request, 48.

Moreover, a POSITA would have had a particular motivation to *expand the image frames* because some systems required larger frames. For example,[4] Miyazaki considers the NTSC system with 525-line frames, but there were also other countries that used larger, e.g., 625-line, frames. Request, 48. Thus, "the market forces of supplying video for high performance televisions in the [625-line frame] market would have prompted a POSITA to apply Compton to Miyazaki to obtain the frames of the correct size for the [625-line][5] market for processing through Miyazaki's interpolation methods, resulting in the predic[t]able variation of video suited for the high performance televisions in the [625-line] market." Request, 48 (citing Dr. Freedman's testimony at Ex. 1003, ¶109).

Kasagi is not required for this combination—it is provided merely for corroborating evidence of POSITA knowledge about frame size requirements for various television systems. Dr. Freedman explains that a POSITA would have understood the NTSC system is name for the CCIR-M system, and as Kasagi corroborates, a POSITA would have understood the NTSC/CCIR-M systems used 525-line frames. Ex. 1003, ¶107. Additionally, Dr. Freedman testifies that a POSITA

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[4] Though the Request provides broader motivations for *expanding* and *combining frames,* this Reply focuses on a particular example to help clarify the errors in the PO Statement.

[5] To the extent the use of CCIR-G confused the issues presented in SNQ6, this Reply has replaced CCIR-G with the 625-line frame size, which is the relevant fact about CCIR-G for this SNQ.

would have known that there were other systems that used different, larger, frame sizes, such as the CCIR-G system that used 625-line frame sizes, which is again corroborated by Kasagi. Ex. 1003, ¶108.

Thus, PO has misunderstood the proposed combination. The Request does not rely on Kasagi's teachings in the combination for SNQ6, and it does not propose conversion standard definition NTSC/CCIR-M video to standard definition CCIR-G video (e.g., converting from 30fps, 525 scan line video to 24fps, 625 scan line video). The Request relies on Miyazaki's explicit examples of converting standard-definition video for a 525-line system to a high-definition video, and, motivated by market forces for the resulting video to be playable on, say, 625-line systems, Compton's teaches how to expanding the image frames before they are converted by Miyazaki so that they will operate on larger-frame systems (e.g., converting 60 fps, 525-line video to 120 fps, 625-line video). *See, e.g.,* Request, 48.

## V. CONCLUSION

For at least the reasons presented above, Requester the Challenged Claims of the '380 Patent are invalid over the prior art and evidence provided in the Request. Requester therefore requests that an Office Action rejecting claims 1-10 be issued.

Dated: May 22, 2025

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