

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PRICELINE.COM LLC AND BOOKING.COM B.V.,  
Petitioner

v.

DDR HOLDINGS, LLC,  
Patent Owner

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Case IPR2019-00438  
Patent 9,639,876

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**DDR'S WAIVER OF PATENT OWNER'S PRELIMINARY RESPONSE**

Given the Board's institution of a related proceeding (IPR2018-01011) brought by Shopify, Inc., and based on the representations by Petitioner (Priceline.com LLC and Booking.com B.V.) that (1) Petitioner has chosen to decline to raise any grounds of invalidity beyond those in the corresponding Shopify IPR, (2) Petitioner agrees to an understudy role and will present no other filings or oral arguments beyond Shopify's unless Shopify withdraws, and (3) as a result Patent Owner will not need to respond to any additional papers or arguments, Patent Owner hereby waives its Patent Owner Preliminary Response pursuant to 37 CFR 42.107(b) and consents to Petitioner's Motion for Joinder. Nevertheless, Patent Owner maintains that the petitions do not show that the patent is invalid, for the reasons given in the response to the Shopify petition, and reserves the right to maintain such arguments in the consolidated proceeding.

Respectfully submitted,

Dated: April 11, 2019

/Louis J. Hoffman/  
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**CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))**

The undersigned hereby certifies that on April 11, 2019, a complete and correct copy of the foregoing document was served via electronic mail on the following counsel of record for Petitioner:

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