

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

BENTLEY MOTORS LIMITED  
AND  
BENTLEY MOTORS, INC.

Petitioner

v.

JAGUAR LAND ROVER LIMITED

Patent Owner

---

U.S. Patent No. RE 46,828

Case No.: IPR2019-01539

---

**REQUEST FOR REFUND OF POST-INSTITUTION FEES**

*Mail Stop "PATENT BOARD"*  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Bentley Motors Limited and Bentley Motors, Inc. (“Petitioners”) respectfully requests a refund of \$15,000.00, the post-institution fees initially paid for the petition for *inter partes* review of U.S. Patent No. RE 46,828 (“the ’828 patent”), assigned case number IPR2019-01539.

On August 23, 2019, Petitioners filed a petition for *inter partes* review of claims 21, 24, 30, 32-34, 37, 39, 41-43, and 46 of the ’828 patent. On October 2, 2020, the Board denied Petitioners’ Request on Rehearing of Decision Denying Institution of *Inter Partes Review* 37 C.F.R. 42.71 (d). Paper No. 16. Because no trial has been instituted in this proceeding, Petitioner requests a refund of \$15,000.00, the post-institution fees paid under 37 C.F.R. § 42.15(a)(2). Payment of the post-institution fees was processed through PTAB E2E on August 23, 2019 and charged to the undersigned’s Deposit Account No. 500320. Upon review and approval of this request, Petitioner respectfully requests that the Board credit \$15,000.00 to Deposit Account No. 500320.

Dated: November 5, 2020

Respectfully submitted,

By: /s/ Edgar H. Haug

Edgar H. Haug (Reg. No. 29,309)  
Robert E. Colletti (Reg. No. 76,417)  
Brian P. Murphy (Reg. No. 34,986)  
Georg C. Reitboeck (*pro hac vice* to be requested)

Christopher F. Gosselin (*pro hac vice* to be requested)

IPR2019-01539  
Patent No. RE 46,828

**HAUG PARTNERS LLP**

745 Fifth Avenue, 10th Floor

New York, NY 10151

Telephone: (212) 588-0800

Facsimile: (212) 588-0500

Email: BentleyIPR@Haugpartners.com

*Counsel for Petitioner*

Bentley Motors Limited and Bentley

Motors, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 5, 2020, in accordance with 37 C.F.R. § 42.6(e), a copy of this “Request for Refund of Post-Institution Fees” was provided via email to Patent Owner’s lead and backup counsel, as follows:

Jonathan M. Strang (Reg. No. 61,724)  
jonathan.strang@lw.com  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW, Ste. 1000  
Washington, D.C. 20004-1304  
Telephone: 202.637.2362  
Fax: 202.637.2201

Clement Naples (Reg. No. 50,663)  
clement.naples@lw.com  
LATHAM & WATKINS LLP  
885 Third Avenue  
New York, NY 10022-4834  
Telephone: 212.906.1331  
Fax: 212.751.4864

By: /s/ Edgar H. Haug  
Edgar H. Haug