#### UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC,

Petitioner,

v.

### DYNAPASS IP HOLDINGS, LLC

Patent Owner.

Inter Partes Review No. IPR2023-00425
Patent No. 6,993,658
PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY

Filed on behalf of Patent Owner by:

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# **TABLE OF AUTHORITIES**

### Cases

Phillips v. AWH Corp.,	
415 F.3d 1303 (Fed. Cir. 2005) (en banc)	11
Xerox Corp., et al. v. Bytemark, Inc.,	
IPR2022-00624, Paper 9 (P.T.A.B. Aug. 24, 2022) (Precedential)	15



# **EXHIBIT LIST**

Exhibit	Description
2001	Google Patents webpage for U.S. Patent No. 6,993,658,
	https://patents.google.com/patent/US6993658B1/
2002	"Preliminary Constructions," Dynapass IP Holdings, LLC v.
	JPMorgan Chase & Co., et al., No. 2:22-cv-00212-JRG-RSP (E.D.
	Tex.)
2003	Declaration of Rajeev Surati
2004	CV of Rajeev Surati
2005	Microsoft Computer Dictionary (5th ed. 2002)
2006	Claim Construction Order, Dynapass Holdings LLC v. JPMorgan
	Chase & Co., et al., Case No. 2:22-cv-00212-JRG-RSP, Dkt. 120
	(E.D. Tex. Oct. 31, 2023).
2007	Supplemental Declaration of Rajeev Surati



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