No. 2019-1222

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

23ANDME, INC.,

Plaintiff-Appellant,

v.

ANCESTRY.COM DNA, LLC, ANCESTRY.COM OPERATIONS INC., ANCESTRY.COM LLC,

Defendants-Appellees.

On Appeal from the United States District Court
for the Northern District of California, No. 3:18-cv-02791, Judge Edward M. Chen

DEFENDANTS-APPELLEES' RESPONSE TO APPELLANT 23ANDME, INC.'S PETITION FOR REHEARING EN BANC

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December 19, 2019

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CERTIFICATE OF INTEREST

Counsel for Ancestry.com DNA, LLC, Ancestry.com Operations Inc., and Ancestry.com LLC certifies the following:

1. The full name of every party or *amicus* represented by me is:

Ancestry.com DNA, LLC, Ancestry.com Operations Inc., and Ancestry.com LLC

2. The names of the real party in interest represented by me are:

Not applicable.

3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus curiae represented by me are:

Ancestry.com Holdings LLC

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court (and who have not or will not enter an appearance in this case) are:

DEBEVOISE & PLIMPTON LLP: David H. Bernstein, Jeremy Feigelson, Ann Marie Domyancic, Stephanie M. Cipolla.[1]

5. The title and number of any case known to counsel to be pending in this or any other court or agency that will directly affect or be directly affected by this court's decision in the pending appeal:

None.

[1] Debevoise & Plimpton LLP entered appearances in the district court after this appeal was noticed and docketed.

Dated: December 19, 2019

/s/ Mark D. Selwyn

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INTRODUCTION

U.S. Patent No. 8,463,554 ("'554 patent") is directed to a "relative finder system" that involves comparing two people's DNA information using standard genotyping techniques and generic components to determine "a predicted degree of relationship" between the two individuals. Appx57-58. The '554 patent claims only well-known genetic concepts and the naturally occurring correlation between those concepts and the likelihood that two people are related. As the district court summarized, the asserted claims are invalid under 35 U.S.C. § 101 because they (A) are directed to an unpatentable law of nature—i.e., that "the more recombinable DNA information that is shared between two people, the closer the degree of relationship"—and (B) contain no inventive concept sufficient to render them patent-eligible. *See* Appx21-23.

23andMe's petition for rehearing en banc argues that the panel's Rule 36 judgment affirming the district court's invalidity ruling merits en banc review because the district court failed to properly consider whether two dependent claims (claims 7 and 12) survive § 101 review. This kind of case-specific concern does not conflict with this Court's case law; nor is it the kind of question of "exceptional importance" that merits en banc intervention. To the contrary, the district court's ruling is supported by longstanding precedent holding that a naturally occurring relationship that "exists in principle apart from any human action" is not patent-

eligible. *See Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 566 U.S. 66, 77 (2012); *see also Genetic Techs. Ltd. v. Merial L.L.C.*, 818 F.3d 1369, 1374 (Fed. Cir. 2016) (claims involving the "relationship between non-coding and coding sequences" in DNA claim a law of nature); *Ariosa Diagnostics, Inc. v. Sequenom, Inc.*, 788 F.3d 1371, 1377 (Fed. Cir. 2015) (claims involving detecting the presence of "cffDNA in maternal plasma or serum" claim a law of nature).

The petition should be denied.

REASONS FOR DENYING THE PETITION

I. THE PANEL CORRECTLY AFFIRMED THE DISTRICT COURT'S DETERMINATION THAT CLAIM 12 IS NOT PATENT-ELIGIBLE.

A. Claim 12 Is Not Patent-Eligible Under The *Alice/Mayo* Test.

Apparently recognizing the futility of its arguments with respect to the vast majority of the '554 patent's asserted claims, 23andMe focuses most of its petition on a single dependent claim (claim 12), emphasizing an argument that occupied just a few pages in its opening brief before the panel. *See* 23andMe Br. 35-36, 56-58. Even for that one claim, however, 23andMe fails to identify anything that would render it patent-eligible. Nor does 23andMe identify any conflict with this Court's or the Supreme Court's precedent at either step of the *Alice*/*Mayo* framework that would warrant further review of that single claim. 23andMe's request that this Court grant rehearing as to claim 12 of the '554 patent should be denied.

***Alice* Step 1.** At *Alice* step 1 (whether the claims are "directed to" unpatentable subject matter), 23andMe first seeks to manufacture a conflict between this Court's affirmance of the unpatentability of claim 12 and *Association for Molecular Pathology v. Myriad Genetics, Inc.*, 569 U.S. 576, 595 (2013). *See* Pet. 11-12. But there is none. Contrary to 23andMe's suggestion, claim 12 does not recite "manipulating genes." *Id.* 11 (quoting *Myriad*, 569 U.S. at 595). Indeed, as the panel observed at oral argument, the word "manipulation" does not even appear in the claims. Oral Argument Tr. 10:36-10:43 (Chief Judge Prost noting that the patent "doesn't use the word manipulation, right? That word isn't in the claims.").

As in *Myriad*, 23andMe "did not create or alter any of the genetic information encoded in the [Inheritance by Descent (IBD) regions]. … Nor did [23andMe] create or alter the genetic structure of DNA." 569 U.S. at 590. Instead, 23andMe merely purports—like the patentee in *Myriad*—to have identified the "precise location" of such IBD regions. *Compare id.* at 575, 590 *with* Pet. 12 (claim 12 claims a method "to utilize the underlying SNP information to identify IBD"). That is insufficient to render claim 12 patent-eligible. *E.g.*, Ancestry Br. 37-39.[2]

[2] The panel discussed this point at some length. *See, e.g.*, Oral Arg. Tr. 12:24-12:33 (Chief Judge Prost: "Your definition of manipulation seems to be comparing the DNA information between two individuals."). And as 23andMe itself

Specifically, claim 12, which depends from claims 1 and 7, recites using DNA markers (Single Nucleotide Polymorphisms ("SNPs")) to identify IBD regions:

> 12. The method of claim 7, wherein identifying one or more IBD regions includes:
>
> identifying consecutive opposite-homozygous calls in a SNP sequence of the first user and in a SNP sequence of the second user, wherein the first user and the second user have opposite-homozygous calls at a given SNP location where the first user and the second user do not share an allele;
>
> determining, based at least in part on a distance between the consecutive opposite-homozygous calls, whether a region between the opposite-homozygous calls is an IBD region.

Appx62(11:38-49).

As the specification makes clear, IBD regions are naturally occurring. "[O]nly relatives will share long stretches of genome regions where their recombinable DNA is completely or nearly identical." Appx57(2:36-38). Such regions are generally "referred to as 'Identical by Descent' (IBD) regions because they arose from the same DNA sequences in an earlier generation. Appx57(2:37-

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conceded, its briefing used the word manipulation to describe the basic act of adding up the number of DNA regions shared between two individuals. *Id.* 11:52-11:58 (Judge Hughes: "Is that what you mean by manipulation—that you add stuff together?" 23andMe Counsel: "Absolutely, your honor."); *see also infra* pp. 13-14 (discussing claim 7's "summing" limitation).

40); *see also* Pet. 4 (acknowledging that IBD regions are DNA "inherited from a common ancestor").[3]

Similarly, SNPs are naturally occurring markers in DNA—"points along the genome with two or more common variations," Appx57(2:49-51)—used to identify IBD regions, Appx61(9:39-40). As the specification explains, SNPs are identified through "standard … genotyping technology," which involves locating and comparing "genotype calls each having two alleles, one from each half of a chromosome pair." Appx59(6:12-16).[4] Because each allele can be represented by "A" or "B," Appx59(6:32-34), each genotype call "may be a heterozygous call with two different alleles" (e.g., AB) or "a homozygous call with two identical alleles" (e.g., AA or BB). Appx59(6:25-29). The specification explains that "[w]hen two individuals have opposite-homozygous calls at a given SNP location" (i.e., one has AA and one has BB), "it is very likely that the region in which the SNP resides does not have IBD since different alleles came from different ancestors." Appx59(6:37-42). However, when two individuals have compatible calls at the same location on the genotype (e.g., both have AA or both have AB), it

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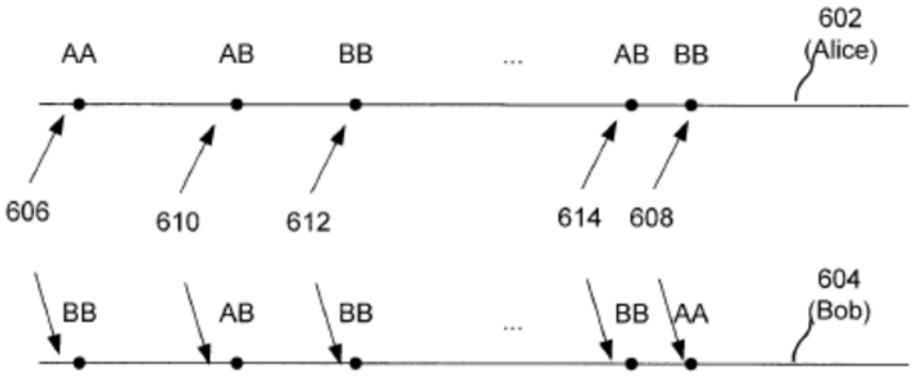
[3] As 23andMe's counsel conceded before the district court, "[t]he actual principle … that there was IBD" predated the '554 patent. Appx806.

[4] Alleles are "the various alternative forms (mutations) of [a] gene," which are found at the same place on a chromosome. *Genetic Techs. Ltd. v. Merial L.L.C.*, 818 F.3d 1369, 1372 (Fed. Cir. 2016). A "genotype call" is "the identification of the pair of alleles at a particular locus on the chromosome." Appx59(6:17-18).

is likely that "at least one allele is passed down from the same ancestor" and the area is IBD. Appx59(6:32-55).

For example, Figure 6 of the patent depicts genotype calls between two people detected using the "standard SNP based genotyping technology" mentioned in the specification:



Appx53(Fig. 6). Because the calls at 610, 612, and 614 are compatible calls, it is likely that "the region between 606 and 608 is an IBD region" and the two people share an ancestor. Appx60(7:17-32). Thus, as the specification makes clear, both IBD regions and the SNP markers used to identify them "existed in nature before [any human being] found them" and cannot render claim 12 patent-eligible. *Ariosa Diagnostics*, 788 F.3d at 1376.

Nor does claim 12 survive *Alice* step 1 because it lays out "new and innovative series of ordered rules to determine whether a DNA segment is an IBD." Pet. 13. The specification makes clear that the IBD regions are identified using "[t]he ***standard*** SNP based genotyping technology," based on known,

naturally occurring relationships. Appx59(6:14-16) (emphasis added). The patent does not describe or claim any new technique for genotyping or for identifying IBD regions.

Even if the patent had included some innovative process to identify and measure IBD regions—rather than simply relying on admittedly standard processes—claim 12 would still be ***directed to*** naturally occurring concepts like IBD and SNP markers. *See supra* pp. 4-6. As the Supreme Court has explained, "[g]roundbreaking, innovative, or even brilliant discovery does not by itself satisfy the § 101 inquiry." *Myriad*, 569 U.S. at 591. This Court has accordingly held that claims involving the detection of a law of nature or natural phenomenon are directed to patent-ineligible subject matter. *E.g.*, *Cleveland Clinic Found. v. True Health Diagnostics LLC*, 859 F.3d 1352, 1360 (Fed. Cir. 2017); *Genetic Techs.*, 818 F.3d at 1374; *Ariosa Diagnostics*, 788 F.3d at 1376. That is precisely what the '554 patent claims. *See supra* pp. 3-6; *see also* Ancestry Br. 26-29.

23andMe's only answer is to attempt to distinguish cases like *Cleveland Clinic*, *Genetic Technologies*, and *Ariosa* on the ground that they dealt with "purely conventional" or "routine" techniques. Pet. 11-12. But whether the claims add an inventive concept is considered at *Alice* step 2 and is distinct from whether the claims are ***directed to*** unpatentable subject matter. *See infra* pp. 9-10 (discussing this point).

The cases 23andMe cites to support its position, Pet. 13, are not to the contrary. For example, *Rapid Litigation Management Ltd. v. CellzDirect, Inc.*, 827 F.3d 1042 (Fed. Cir. 2016), claimed novel "cryo-preservation techniques to preserve liver cells for later use," *see Cleveland Clinic*, 859 F.3d at 1361, which were far removed from claims—like those here—that involve "observing or identifying" a law of nature, 827 F.3d at 1048; *see also* Appx22-23 (district court decision distinguishing *CellzDirect*). Similarly, *McRO, Inc. v. Bandai Namco Games America Inc.*, 837 F.3d 1299 (Fed. Cir. 2016)—which involved the abstract idea exception—is also inapposite, as the claims were drawn to a ***specific application*** of lip synchronization and facial expressions of animated characters on a screen. *Id.* at 1313. Finally, *Thales Visionix Inc. v. United States*, 850 F.3d 1343 (Fed. Cir. 2017), is particularly far afield. The patent at issue there claimed "an inertial tracking system for tracking the motion of an object relative to a moving reference frame." *Id.* at 1344. The asserted claims did not simply claim the equations that made the system possible (i.e., an abstract idea) but rather "the application of physics to the unconventional configuration of sensors." *Id.* at 1349. Here, in contrast, the asserted claims involve only detecting a law of nature, without an improvement in existing technology.[5]

[5] 23andMe also asks the Court to "see generally" *Diamond v. Diehr*, 450 U.S. 175 (1981), Pet. 13, but that case involved an abstract concept (a mathematical equation) that was integrated into a broader "process to solve a technological

***Alice* Step 2.** At *Alice* step 2 (whether the claims identify an "inventive concept"), claim 12 is comprised of little beyond the claimed natural law. This is insufficient to state an inventive concept because even "a claim directed to a newly discovered law of nature … cannot rely on the novelty of that discovery for the inventive concept necessary for patent eligibility." *Genetic Techs.*, 818 F.3d at 1376.

23andMe now argues that claim 12's "steps of utilizing consecutive opposite homozygous calls and distance to identify IBD" claim an inventive concept. Pet. 13-14. But the specification itself recognizes that both IBD regions and the SNP markers used to identify those regions are naturally occurring, and the alleged invention relies on "***standard*** SNP based genotyping," Appx59(6:14-16) (emphasis added). Moreover, as discussed above, focusing on the distance between opposite homozygous calls to determine relative relatedness simply acknowledges the natural law that "long stretches of genome regions" where relatives' "recombinable DNA is completely or nearly identical … ***are referred to as***" IBD regions. Appx57(2:36-43) (emphasis added); *see supra* pp. 4-5 & n.3.

More broadly, 23andMe does not cite any place in the record where it preserved this argument before the district court. Instead, it asserts that it made

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problem" related to curing rubber. Here, claim 12 merely ***detects*** a naturally occurring relationship between individuals; it does not describe a new process—unconnected to natural law—for determining relative relatedness.

"specific allegations" in the Complaint that these steps were unconventional. Pet. 14 (citing Appx77-78(¶¶ 20, 22). This is simply false. As relevant here, paragraphs 17-20 of the Complaint merely summarize the prior art and repeat either verbatim or by close paraphrase the patent's (unasserted) independent claims and dependent claims 7 and 12. Appx76-78.

The Complaint also baldly asserts that the claims at issue here (A) "are not directed to laws of nature, natural phenomena, or abstract ideas," and (B) are "novel, non-obvious and involve more than the performance of well-understood, routine[,] and conventional activities previously known in the industry." Appx78(¶¶ 21-22). Paragraphs 21-22 offer no further details, and 23andMe never sought leave to amend its patent infringement claim to provide them. Ancestry Br. 17 & n.9. Such allegations, which "[s]imply recite the elements of a cause of action," are not entitled to any weight. *See Levitt v. Yelp! Inc.*, 765 F.3d 1123, 1134-1135 (9th Cir. 2014); *see also K-Tech Telecomms., Inc. v. Time Warner Cable, Inc.*, 714 F.3d 1277, 1282 (Fed. Cir. 2013).[6]

[6] To the extent 23andMe's true concern is that the district court did not analyze claim 12, *e.g.*, Pet. 13-14, that too is wrong. The district court specifically recognized that 23andMe was asserting claim 12. Appx11 ("23 claims infringement of the following dependent claims only: claims 5, 7-8, 12-14, 17, 22, 31-32, 37-38."). The court then carefully considered whether any of the asserted claims—including claim 12—were directed to anything beyond the natural law that the more recombinable DNA people share, the more likely they are to be related. Appx21-25. Regardless, this Court had the independent authority to resolve—without remanding—whether the asserted claims (including claim 12)

B. The District Court Properly Resolved Whether Claim 12 Describes An Inventive Concept At The Motion To Dismiss Stage.

23andMe also contends that it was inappropriate for the district court to dismiss the case on the pleadings on the inventive concept issue. Pet. 14-15. But even since the district court's opinion issued in this case, this Court has affirmed dismissals under § 101 at the pleading stage on numerous occasions. *See* Ancestry Br. 52 (collecting cases). Indeed, 23andMe's own authority establishes that "patent eligibility can be determined at the Rule 12(b)(6) stage … when there are no factual allegations that, taken as true, prevent resolving the eligibility question as a matter of law." *Aatrix Software, Inc. v. Green Shades Software, Inc.*, 882 F.3d 1121, 1125 (Fed. Cir. 2018).

That was the case here, as the Complaint provided ***no*** specific factual allegations supporting its contention that the '554 patent claims patentable subject matter. *See supra* pp. 9-10. This is very different from the facts of *Aatrix*, where the Complaint made "concrete allegations … that individual elements and the claimed combination are not well-understood, routine, or conventional activity." 882 F.3d at 1128.

23andMe also appears to rely on *Natural Alternatives International, Inc. v. Creative Compounds, LLC*, 918 F.3d 1338, 1347 (Fed. Cir. 2019), for the principle

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were invalid under § 101. *See* Ancestry Br. 58. Here, the panel had good reason to conclude that claim 12 claimed unpatentable subject matter. *See supra* pp. 2-10.

that a motion to dismiss on § 101 grounds is inappropriate unless there is a clear statement in the specification or complaint that the invention is well-understood, routine, and conventional. *See* Pet. 14-15. But here, the specification includes just such a clear statement, as it explicitly acknowledges that the claimed IBD regions are identified using "***standard*** SNP based genotyping technology." Appx59(6:14-16) (emphasis added). Regardless, as in *Aatrix*, the *Natural Alternatives* complaint set forth specific "factual allegations [that] together with all reasonable inferences, plausibly establish[ed]" that the patent claimed patent-eligible subject matter under § 101. *See* 918 F.3d at 1343. Here, in contrast, the Complaint contained no such allegations, and the district court was well within its authority to grant the motion to dismiss. *See Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (pleading that merely offers "labels and conclusions" does not state a claim).[7]

II. THE PANEL CORRECTLY AFFIRMED THE DISTRICT COURT'S DETERMINATION THAT CLAIM 7 IS NOT PATENT-ELIGIBLE.

In a last-ditch attempt to save a subset of the asserted '554 patent claims, 23andMe contends that the district court erred by holding that claim 7 is not

[7] That *Natural Alternatives* does not create a *per se* rule that a clear statement denying inventive concept is always required—no matter how deficient the pleadings—aligns with this Court's previous decisions. For example, this Court has previously affirmed the grant of a motion to dismiss on § 101 grounds without any such clear statement by the patentee. *E.g.*, *Voter Verified, Inc. v. Election Sys. & Software LLC*, 887 F.3d 1376, 1386 (Fed. Cir. 2018); *OIP Techs., Inc. v. Amazon.com, Inc.*, 788 F.3d 1359, 1363-1364 (Fed. Cir. 2015).

patent-eligible. Pet. 15-17. But, as with claim 12, 23andMe identifies no aspect of claim 7 that would warrant further review by this Court.[8]

With regard to *Alice* step 1, 23andMe asserts that the panel oversimplified claim 7 and ignored that it "recites a novel and innovative way to find relatives" by "manipulat[ing] IBD information by summing the length of the IBD segments and/or determining the percentage of shared DNA in the IBD regions." Pet. 15-16. But as Ancestry explained, neither the purported "IBD claims" nor the specification describe any such "manipulation." *See* Ancestry Br. 37-39; *see also supra* p. 3. The asserted "claims are simply not expressed in terms of chemical composition, nor do they rely in any way on … chemical changes that result from the [summing] of a particular section of DNA." *See Myriad*, 569 U.S. at 593. Rather, the claims recite that "the predicted degree of relationship" between two people is ***based on*** "a sum of the lengths of IBD regions [i.e., identical DNA], percentage of DNA shared in IBD regions, or both"—a natural law that involves no physical "manipulation" of DNA. Appx62(11:9-15). Indeed, claim 7 expressly recites that "a greater amount of DNA sequence information of the IBD regions indicates a closer predicted degree of relationship." Appx62(11:16-18). Accordingly, as the district court explained, "summing (*e.g.*, DNA lengths shared

[8] 23andMe's petition briefly mentions that claim 7 is "representative of [c]laims 14, 22, and 31." Pet. 15. It does not, however, suggest that these three claims would survive if claim 7 is deemed invalid.

in the IBD region) simply reflects the basic and conventional principle that the more DNA information that is shared, the closer the degree of relationship." Appx24.

With regard to *Alice* step 2, 23andMe contends that the concept of adding IBD regions to determine relative relatedness is novel and unconventional. Pet. 17; *see also* Appx711-712. But nothing in the patent describes "summing" lengths of IBD regions—i.e., simple mathematical addition—as inventive or novel, and this Court's case law holds that analogous concepts are unpatentable abstract ideas. *See Digitech Image Techs., LLC v. Electronics for Imaging, Inc.*, 758 F.3d 1344, 1350-1351 (Fed. Cir. 2014) ("process of organizing information through mathematical correlations"); *FairWarning IP, LLC v. Iatric Systems, Inc.*, 839 F.3d 1089, 1095 (Fed. Cir. 2015) ("collecting and analyzing information"). Tellingly, as the district court noted, "the '554 patent does not even quantify the degree of similarity or correlation which informs the analysis." Appx24. Rather, summing or determining the percentage of shared DNA in order to establish the degree to which two people are related "simply reflects the basic and conventional principle that the more DNA information that is shared, the closer the degree of relationship." *Id.*

III. THE PETITION DOES NOT SATISFY THE DEMANDING STANDARD FOR EN BANC REVIEW.

As detailed above, 23andMe's legal arguments about whether claims 7 and 12 should survive § 101 are meritless. Even if they were not, nothing in the petition identifies an issue deserving of the en banc Court's time and attention.

First, this case involves no "precedent-setting question[] of exceptional importance." Fed. Cir. R. 35. While the petition's statement of counsel asserts that the panel's decision carved out a "categorical exception" to existing law and will allow courts to "circumvent" *Alice*, Pet. 1, the remainder of the petition provides no support for these statements. Instead, 23andMe argues that the panel should not have affirmed the district court's § 101 ruling because the district court misunderstood—or ignored—precisely what the '554 patent claims. *E.g.*, Pet. 2-3. Such case-specific concerns hardly rise to the level of "exceptional importance" that merit en banc review, particularly given that the panel's Rule 36 judgment is not binding on anyone other than the parties.

Nor is rehearing "necessary to secure or maintain uniformity of the [C]ourt's decisions." Fed. R. App. P. 35. The panel's affirmance of the district court's judgment here is entirely consistent with this Court's longstanding precedent regarding claims directed to detecting existing laws of nature. *See supra* pp. 1-2. While 23andMe claims that the panel's decision is "contrary to" a half-dozen prior cases, Pet. 1, it provides no real explanation for why that is so. Notably, none of

the identified cases held that a patent directed to detecting an existing law of nature claimed patentable subject matter.

At the end of the day, 23andMe asks the en banc Court to sink substantial time and resources into further review of a Rule 36 judgment that affirmed a district court's careful application of established § 101 doctrine. This kind of narrow dispute is not worthy of the en banc Court's attention. The petition should be denied.[9]

CONCLUSION

The petition for rehearing en banc should be denied.

[9] 23andMe's passing assertion that a Rule 36 judgment was inappropriate in this case, Pet. 10-11, does not change this calculus. 23andMe cites no doctrinal authority for the proposition that Rule 36 cannot be used when "significant property rights are at stake." *Id.* Indeed, its only citation is a pending petition for certiorari that was denied two weeks after 23andMe's en banc petition was filed. *See Straight Path IP Group, LLC v. Apple Inc.*, No. 19-253 (S. Ct.) (denied Nov. 18, 2019). As a respondent in that case pointed out, the Supreme Court has denied similar challenges to this Court's reliance on Rule 36 a dozen times in the last decade. Brief of Respondent Apple Inc. in Opposition 10-11, No. 19-253 (S. Ct. Oct. 18, 2019).

Respectfully submitted,

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December 19, 2019

CERTIFICATE OF SERVICE

I hereby certify that, on this 19th day of December, 2019, I filed the foregoing with the Clerk of the United States Court of Appeals for the Federal Circuit via the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(g), the undersigned hereby certifies that this response complies with the type-volume limitation of Fed. Cir. Rule 35(e)(4).

1. Exclusive of the exempted portions of the petition, as provided in Fed. Cir. Rule 35(c)(2), the response contains 3,757 words.

2. The response has been prepared in proportionally spaced typeface using Microsoft Word 2016 in 14-point Times New Roman font. As permitted by Fed. R. App. P. 32(g), the undersigned has relied upon the word count feature of this word processing system in preparing this certificate.

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