

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIGHTRICKS LTD.,
Petitioner,

v.

PLOTAGRAPH, INC. and SASCHA CONNELLY,
Patent Owner.

Case IPR2023-00154
U.S. Patent No. 10,621,469
Filing Date: Oct. 16, 2018
Issue Date: Apr. 14, 2020

DECLARATION OF ROBERT GREESON

I. INTRODUCTION

1. My name is Robert Greeson. I am over the age of twenty-one (21) years, of sound mind, and capable of making the statements set forth in this Declaration. I am competent to testify about the matters set forth herein. All the facts and statements contained herein are within my personal knowledge and they are, in all things, true and correct.

2. I represent Lightricks Ltd. (“Petitioner”) as Lead Counsel in this proceeding.

3. On January 23, 2023, I contacted Chase Bank to authorize a \$41,500 payment via my debit card to pay the filing fee for the Petition (Paper 1), Power of Attorney (Paper 2), and exhibits EX1001 through EX1024 in this proceeding. I provided my debit card information to Lu Ling, who is Back-Up Counsel in this proceeding, and instructed him to pay the filing fee using my debit card. My bank account linked to the debit card contained more than \$41,500 at this time.

4. Mr. Ling informed me that he had submitted the payment for the filing fee using my debit card but that P-TACTS showed that the Petition was still unsubmitted. I accessed my bank account information via the Chase Bank application, which indicated that \$41,500 was debited from my account for “POS DEBIT US PATENT TRADEMARK ALEXANDRIA VA.” I also contacted a representative from Chase Bank over the phone, who confirmed that \$41,500 had

been debited from my account accordingly. Below is a screenshot from my bank account statement showing a “Card Purchase” in the “Amount” of “\$41,500.00” for “01/23 US Patent Trademark 571-272-6500,” which reflects the January 23 payment.

DESCRIPTION	AMOUNT
Card Purchase 01/23 US Patent Trademark 571-272-6500 VA Card 9231	\$41,500.00

II. CONCLUSION

5. All statements made herein of my own knowledge are true, all statements made herein on information and belief are believed to be true, and these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. §1001.

Dated: June 22, 2023

Robert Greeson
Robert Greeson