UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.
Petitioner,

v.

MEETRIX IP, LLC,
Patent Owner.

Case IPR2023-00371
U.S. Patent No. 8,339,997

DECLARATION OF CAROLYN CHANG

I, Carolyn Chang, declare as follows:

1. I am an attorney at the law firm of Marton Ribera Schuman & Chang LLP, counsel for Petitioners Zoho Corporation and Zoho Corporation Pvt., Ltd. (hereinafter collectively "Zoho"). I submit this declaration in support of Zoho's Motion for Admission *Pro Hac Vice* of Carolyn Chang. I have personal knowledge of the facts set forth herein and could testify to such facts under oath.

2. I have been a litigation attorney in private practice since 2001. The primary focus of my practice during that time has been patent litigation.

3. I am a member in good standing of the California State Bar. I am admitted to practice before the following courts:

- United States District Court for Northern District of California
- United States District Court for Southern District of California
- United States District Court for Eastern District of California
- United States District Court for Central District of California
- United States District Court for Eastern District of Texas
- United States Court of Appeals for the Federal Circuit
- The Supreme Court of the United States

4. I have never been suspended, disbarred, sanctioned, or cited for contempt by any court or administrative body.

5. I have never had a court or administrative body deny my application for admission to practice.

6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R.

7. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct, as set forth in 37 C.F.R. §§ 11.01 et seq., and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. In the past three years, I have appeared *pro hac vice* in the following IPR proceedings before the United States Patent and Trademark Office: IPR2019-00377, IPR2021-00939, IPR2021-00938, IPR2021-00937, and IPR2021-00936.

9. I am familiar with the subject matter at issue in this proceeding. I have reviewed U.S. Patent Nos. 9,253,332; 9,094,525; 9,843,612; and 8,339,997 ("challenged patents"), the prior art at issue, the Petition, and the evidence submitted in the proceeding.

10. I am litigation counsel for Zoho in the District Court litigation filed by Meetrix IP, LLC, asserting the challenged patents in the Western District of Texas, *Meetrix IP, LLC v. Zoho Corporation*, No. 6:21-cv-01288 (W.D. Tex.), against Zoho.

I am aware that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. § 1001). All statements made in this declaration of my own knowledge are true and all statements made on information and belief are believed to be true. I declare under penalty of perjury that the forgoing is true and correct.

Date: July 26, 2023

By: */Carolyn Chang/*

Carolyn Chang

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