UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIEMENS MOBILITY, INC., GROUND TRANSPORTATION SYSTEMS USA, INC., HUMATICS CORP., and PIPER NETWORKS, INC.

Petitioners,

v.

METROM RAIL, LLC
Patent Owner.

Case No. IPR2023-00468
Patent No. 9,043,131

DECLARATION OF STEVE MOORE IN SUPPORT OF PETITIONERS' OPPOSITION TO MOTION FOR ADDITIONAL DISCOVERY

I, Steve Moore, hereby declare and state as follows:

1. I am an attorney at Dority & Manning, P.A., counsel for Petitioner, Piper Networks, Inc. ("Petitioner" or "Piper"). I have personal knowledge of the facts stated herein, and, if called upon, could and would testify competently to them. I submit this declaration in support of Petitioner's Opposition to Patent Owner's Motion for Additional Discovery.

2. I understand that Helix does not refer to a particular product, system or configuration, but rather is a general marketing term that refers to using different sensors to meet various functional requirements. As such, Metrom's document requests relating to what Metrom incorrectly describes as a Helix product or system instead broadly implicate almost the entirety of Piper's business operations and would require Piper to search, process and review nearly all of its business records relating to technical, marketing and sales without being limited to any particular products, systems or configurations, in order to respond.

3. Counsel for Petitioner currently estimates that it would take upwards of 60 days for two Piper program managers and an office manager at a cost to Petitioner Piper of more than $179,000 (not including additional opportunity cost and business production delays) to fully respond to these broad additional requests for production from Patent Owner.

Executed on this 25th day of July, 2023.

By: _____
Steve Moore