

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.,

Petitioner,

v.

HONGJIA WANG,

Patent Owner.

Case IPR2023-00473

Patent 11,007,583

**Declaration of Katherine Chen in Support of Petitioner's Unopposed Motion
for *Pro Hac Vice* Admission**

I, Katherine Chen, hereby declare as follows:

1. I am an attorney with the law firm of Carlson, Caspers, Vandenburg & Lindquist P.A. (“Carlson Caspers”). This declaration is submitted on behalf of Petitioner Viking Drill & Tool, Inc. (“Viking”) in support of its Unopposed Motion for *Pro Hac Vice* Admission of Litigation Counsel. This declaration is made on my own personal knowledge, except as otherwise indicated.
2. I am a member in good standing of the Bar of the State of Minnesota (Minnesota Bar Number 0403528).
3. I have never been suspended or disbarred from any court or administrative body.
4. No application for admission to practice before any court or administrative body that I have filed or that has been filed on my behalf has ever been denied.
5. No sanctions or contempt citations have been imposed on me by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Practice Guide and the Board’s Rules of Practice for Trials set forth in part 42 of 37 C.F.R.

7. I agree to be subject to USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et. seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. I have not applied for *pro hac vice* admission before the Patent Trial and Appeal Board in any other matter.

9. I have been involved in litigations involving patent infringement. I have practiced law for under a year. I have extensive experience with patent issues related to anticipation under 35 U.S.C. § 102 and obviousness under 35 U.S.C. § 103, which are the legal theories on which this *Inter Partes* Review was instituted. In the course of my experience litigating patents, I have analyzed prior art, prepared prior art statements and responses, worked with validity experts, and drafted and filed briefing related to anticipation and obviousness arguments.

10. I am familiar with the subject matter at issue in this proceeding. My law firm, Carlson Caspers, represents Petitioner in a patent infringement lawsuit that is pending in the United States District Court for the District of Minnesota (Civil Action. No. 0: 21-cv-02759 (JWB/JFD), filed December 28, 2021), in which I am an attorney of record for Petitioner. This lawsuit involves the patent at issue in this *Inter Partes* Reviews, U.S. Patent No. 11,007,583, and involves the same parties. Through my work on this case, I have gained

familiarity with the subjects at issue and the patent at issue in this IPR and the related IPR proceedings.

11. I have also reviewed in detail each of U.S. Patent No. 11,007,583, the Petitions and corresponding exhibits and expert declaration filed by Petitioner Viking in this and the related proceedings, the Patent Owner Hongjia Wang's Preliminary Response and associated exhibits, and the Board's Decision instituting review.

12. My technical background, which includes a Bachelor of Science undergraduate degree in Genetics, Cell Biology and Development from the University of Minnesota-Twin Cities, and prior patent litigation experience provides me with additional understanding of the subject matter at issue and will aid me in my representation of Viking Drill & Tool in this proceeding.

I state under penalty of perjury that the foregoing is true and correct.

Dated: July 19, 2023

/s/ Katherine Q. Chen
Katherine Q. Chen