UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.
Petitioner
v.

HONGJIA WANG
Patent Owner

IPR2023-00473

U.S. Patent No. 11,007,583

DECLARATION OF SARAH JUPINA IN SUPPORT OF PATENT OWNER'S OPPOSITION TO PETITIONER'S MOTION TO STRIKE

DECLARATION OF SARAH JUPINA

I, Sarah Jupina, declare as follows:

1. I work as a Patent Paralegal at Ervin Cohen & Jessup LLP and work closely with Kelly Cunningham on his intellectual property matters. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe that they are true. If called as a witness, I could and would competently testify to the matters stated herein.

2. Throughout October 31, 2023, I was working with Kelly Cunningham and his team of associates, patent agents, and legal secretary to file the Patent Owner Hongjia Wang's Response to Petitioner's Viking Drill & Tool's Petition for Inter Partes Review of U.S. Patent No. 11,007,583 in both the IPR2023-00473 and IPR2023-00474 proceedings.

3. I started uploading our filing documents around 8:30pm. There were several documents that took several minutes to upload to the PTACTS system, which slowed down my filing process considerably. In fact, there were three (3) MP4 files, Exhibits 2050, 2053 and 2054, that were too large to upload on the PTACTS system. The problem with these videos was that they were large, roughly 50 megabytes, 344 megabytes and 150 megabytes, respectively. These Exhibits 2050, 2053, and 2054 are videos that demonstrate industry praise and recognition of Mr. Wang's patented drill bit innovation, even citing to the specific claimed tip configuration as the cause

for the unexpectedly improved performance and function of his drill bits. I was unaware until just this morning, when I received an email response from the PTAB AIA Trials department regarding how to file large documents, that the system had an upload capacity of 25 megabytes per document. Due to this memory size issue, there was some delay in figuring out how to proceed with uploading and filing the necessary papers for the client.

4. Additionally, while uploading documents for IPR2023-00474, the PTACTS system crashed on me more than once, which led to further delays in getting all documents uploaded and filed.

5. I served these papers on the Petitioner by 10:24 PDT on November 1, 2023.

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

Executed on this day, January 3, 2024, at Beverly Hills, California.

/s/ Sarah Jupina

Sarah Jupina