

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC

Petitioner

v.

DDC TECHNOLOGY, LLC,

Patent Owner

U.S. Patent No. 10,528,199

Case No.: IPR2023-00709

DECLARATION OF MICHAEL L. KIKLIS

I, Michael L. Kiklis, of Alexandria, VA, declare as follows:

1. I am lead counsel for Petitioner in the above-captioned case.
2. I am an attorney in good standing and licensed to practice law in the state of Virginia and the District of Columbia. I am also in good standing and registered to practice before the U.S. Patent and Trademark Office in patent matters.
3. I have personal knowledge of the facts stated below and would be competent to testify to them.
4. Petitioner's Exhibit 1024 is a true and correct PDF printout of the third worksheet of a spreadsheet that Petitioner produced at the district court to Patent Owner in native format as GOOG-DDC-0000364. Exhibit 1024 reflects the sales of Google of Google Cardboard viewers and all sales of members of the Works With Google Cardboard ("WWGC") program of viewers sold under the program from 2014 through 2021 and was downloaded from the internal system of Google. This spreadsheet contains accurate sales information for WWGC members. This spreadsheet was maintained by the team managing the Cardboard and WWGC program in the ordinary course of Google's business.
5. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false

statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the results of these proceedings.

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

Executed on April 21, 2024.



Michael L. Kiklis